

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

ROGERS & SON LAWN CARE  
& LANDSCAPING, LLC  
D/B/A AFFORDABLE TREE SERVICES,  
Debtor in Possession

Chapter 11

Case No. 1-17-bk-00367-RNO

DEBTOR IN POSSESSION'S MOTION FOR EXTENSION OF EXCLUSIVITY PERIOD WITHIN  
WHICH TO FILE CHAPTER 11 PLAN OF REORGANIZATION  
AND DISCLOSURE STATEMENT AND EXTENSION OF TIME  
TO FILE A CHAPTER 11 PLAN OF REORGANIZATION AND DISCLOSURE STATEMENT

COMES NOW, this 29<sup>th</sup> day of June, 2017, the Debtor in Possession, by and through its Counsel, CGA Law Firm, Lawrence V. Young, Esquire, and files the within Motion as follows:

1. Movant is the within Debtor in Possession, Rogers & Son Lawn Care & Landscaping, LLC (hereinafter "Debtor") which filed a voluntary Chapter 11 Petition on February 1, 2017. Debtor is represented by CGA Law Firm, Lawrence V. Young, Esquire, 135 North George Street, York, Pennsylvania 17401.

JURISDICTION AND VENUE

2. The within Motion is filed pursuant to 11 U.S.C. § 1121(b), et seq, in that it seeks an extension of time of the exclusive right to file a Chapter 11 Plan and Disclosure Statement.

3. The issues and matters set forth in this Motion constitute a core proceeding under 28 U.S.C. § 157(b)(2).

4. Jurisdiction in the Bankruptcy Court is appropriate pursuant to 28 U.S.C. § 1334. Venue is appropriate in the United States Bankruptcy Court for the Middle District of Pennsylvania pursuant to 28 U.S.C. § 1409.

RELIEF REQUESTED

5. The 180-day exclusivity period will expire on July 31, 2017.

6. The Debtor has restructured all of its secured debt. Motions seeking approval of Debtor's secured debts are currently pending before this Honorable Court.

7. Additionally, Debtor has now separated his bookkeeping records such that the Debtor's income and expense records are maintained separate and apart from those records of a sister corporation, Affordable Lawn Care and Landscaping, LLC.

8. The Debtor will need the summer season, when it is most active and profitable, to gauge the anticipated levels of revenue and expenses in order to determine the ability of the Debtor corporation to pay its secured debt, its overhead and expenses and return a dividend to its general, unsecured creditors.

9. As such, the Debtor feels that it would be in the best interest of both the Debtor and its creditors if exclusivity period to file a Chapter 11 Plan and Disclosure Statement were extended until October 31, 2017.

10. Additionally, the Debtor is seeking an extension of time within which to file a Plan and Disclosure Statement until February 28, 2018.

11. This request is being made before the expiration of either of these deadlines.

WHEREFORE, the Debtor in Possession respectfully requests that the Court enter the attached Order extending the exclusivity period within which to file a Chapter 11 Plan of Reorganization and Disclosure Statement and extending the time within which to file a Chapter 11 Plan of Reorganization and Disclosure Statement.

Respectfully submitted,

CGA Law Firm

/s/Lawrence V. Young, Esquire  
Lawrence V. Young, Esquire  
Sup. Ct. I.D. No. 21009  
135 North George Street  
York, PA 17401  
(717) 848-4900  
Counsel for Debtor in Possession