

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

RISE ENTERPRISES, S.E.

DEBTOR

CASE NO. 17-04678 (MCF)

CHAPTER 11

**DEBTOR'S MOTION TO EXTEND THE EXCLUSIVITY PERIOD TO FILE THE
DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION AND TO SECURE
VOTES TO CONFIRM THE PLAN OF REORGANIZATION UNDER 11 U.S.C.
SECTION 1121(d)(1)**

TO THE HONORABLE COURT:

COMES NOW, RISE ENTERPRISES, S.E., the Debtor herein, through the undersigned attorney and respectfully states and prays:

1. This case commenced with the filing of a voluntary petition under Chapter 11 of the Bankruptcy Code on June 30, 2017. See Docket 1.
2. The Debtor respectfully requests an extension of sixty (60) days to file the Disclosure Statement and Plan of Reorganization, and to extend the exclusivity period, as provided on Section 1121(d)(1) of the Bankruptcy Code.
3. Debtor's request is based upon the following facts:
 - a. There are pending negotiations with the creditors that need to be resolved prior to the filing of the Disclosure Statement and Plan of Reorganization.
 - b. The Debtor is meeting its obligations as Debtor in possession. Monthly Operating Reports have been filed and quarterly fees have been paid.
 - c. Any extension of time will not harm the creditors but will increase the possibilities of a successful reorganization.
 - d. Debtor makes this request in good faith and without any intent to cause undue delay to the proceedings.
4. 11 U.S.C. Section 1121 allows the Debtor to request the court for cause to reduce or increase the period to file the Disclosure Statement and Plan of Reorganization.

5. In addition, the Debtor requests that the deadline to obtain the votes for the Plan of Reorganization be extended for a term of sixty (60) days after the order approving the Disclosure Statement is entered.
6. It is in the benefit of the creditors and the estate that Debtor is able to reorganize and file a viable plan of reorganization.

WHEREFORE, Debtor respectfully requests that an extension of sixty (60) days be granted for the Exclusivity Period and for the filing of the Disclosure Statement and Plan of Reorganization and allows a term of sixty (60) days after the order approving the Disclosure Statement is entered to procure the votes for the Plan of Reorganization in the above described case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th days of July, 2018.

NOTICE

IS HEREBY GIVEN: That within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the U. S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the motion will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise.

I HEREBY CERTIFY, that in this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the assistant US Trustee and to all participants of CM/ECF; and by first class mail to all other creditors included in the attached creditors list.

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End of Label Matrix
Mailable recipients 25
Bypassed recipients 0
Total 25