

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

In re: PARKER DEVELOPMENT, LLC

Bankruptcy Case No. 16-73359  
Chapter 11

Debtor.

**OBJECTION OF THE DEBTOR, PARKER DEVELOPMENT, LLC TO DISCLOSURE  
STATEMENT FILED BY SUMMITBRIDGE NATIONAL INVESTMENTS III, LLC**

Parker Development, LLC, (hereafter “Debtor”) objects to the Disclosure Statement filed by SummitBridge National Investments, III LLC (hereafter “SummitBridge”) as follows:


1. The Debtor filed its petition under Chapter 11 on September 28, 2016.
2. The Debtor is a Debtor in Possession, and no Trustee has been appointed.
3. SummitBridge filed a Disclosure Statement and Plan of Liquidation on June 16, 2017.
4. The Office of the United States Trustee has filed its objection to the proposed disclosure statement. (ECF#80)
5. The Debtor joins in the Office of the United States Trustee’s objection, and incorporates the objection as if fully set forth herein.
6. In addition to the objection set forth herein, the Debtor objects as the proposed plan purports to appoint a Trustee, post confirmation, in violation of 11 U.S.C. §1104, which provides for the possible appointment of a Trustee only pre confirmation, and only for the grounds or “cause” set forth in that section.

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The McCreedy Law Group, PLLC  
413 West York Street  
Norfolk, VA 23510  
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Counsel for Debtor

7. SummitBridge alleges no "cause" for the appointment of a Trustee pursuant to 11 U.S.C. §1104, and provides no trust agreement to govern the Trustee's Fiduciary duties to creditors or equity security holders.

WHEREFORE, Parker Development, LLC prays the Court deny approval of the Disclosure Statement and grant such further relief as is just.

PARKER DEVELOPMENT, LLC

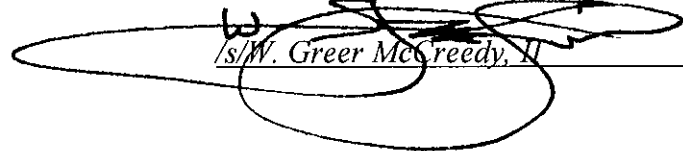


BY: /s/W. Greer McCreeedy, II  
Of Counsel

**CERTIFICATE OF SERVICE**

I certify that, on July 26, 2017:

1. The foregoing objection will be electronically filed with the Clerk of Court using the CM/ECF system, which will send e-mail notice/service of such filing to those listed on the Electronic Mail Notice.
2. A copy of the foregoing motion will be sent by first class mail, postage paid to all creditors and parties in interest as reflected on the attached matrix filed with the Court.



/s/W. Greer McCreeedy, II

Label Matrix for local noticing  
0422-2  
Case 16-73359-SCS  
Eastern District of Virginia  
Norfolk  
Wed Oct 12 15:09:19 EDT 2016

Parker Development, LLC  
852 Tidewater Drive  
Norfolk, VA 23504-3436

United States Bankruptcy Court  
600 Granby St., Room 400  
Norfolk, VA 23510-1915

Crestar Health, LLC  
1130 Tabb Street  
Unit C  
Norfolk, VA 23504-3434

Denise K. Parker  
628 Fordsmere Road  
Chesapeake, VA 23322-2121

Dominion Day Services  
1130 Tabb Street  
Unit E  
Norfolk, VA 23504-3434

Family Systems, Inc.  
1130 Tabb Street  
Unit A & B  
Norfolk, VA 23504-0000

G2 Ops HUB, Inc.  
852 Tidewater Drive  
Suite A  
Norfolk, VA 23504-3436

George G. Parker  
628 Fordsmere Road  
Chesapeake, VA 23322-2121

Internal Revenue Service  
P O Box 7346  
Philadelphia, PA 19101-7346

Ms Clean Services, Inc.  
852 Tidewater Drive  
Suite A  
Norfolk, VA 23504-3436

Open Arms Personal Care, Inc.  
852 Tidewater Drive  
Suite A  
Norfolk, VA 23504-3436

Painters And Allied Trades  
1130 Tabb Street  
Unit F  
Norfolk, VA 23504-3434

Shannon J. Posner, P.A.  
909 Ridgebrook Road, Suite 208  
Sparks Glencoe, MD 21152-9476

SummitBridge  
c/o Shannon Posner  
909 ridgebrook Road, Suite 208  
Sparks Glencoe, MD 21152-9476

Treasurer, City of Norfolk  
PO Box 3215  
Norfolk, VA 23514-3215

Judy A. Robbins  
Office of the U.S. Trustee, Region 4 -N  
200 Granby Street, Room 625  
Norfolk, VA 23510-1819

W. Greer McCreedy II  
The McCreedy Law Group, PLLC  
413 West York St  
Norfolk, VA 23510-1114

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)City of Norfolk, a municipal corporation,

(u)SummitBridge National Investments III LLC

(d)George G Parker  
628 Fordsmere Road  
Chesapeake, VA 23322-2121

End of Label Matrix  
Mailable recipients 17  
Bypassed recipients 3  
Total 20