

1 Leonard M. Shulman – Bar No. 126349
Ryan D. O’Dea – Bar No. 273478
2 **SHULMAN HODGES & BASTIAN LLP**
8105 Irvine Center Drive, Suite 600
3 Irvine, California 92618
Telephone: (949) 340-3400
4 Facsimile: (949) 340-3000
Email: lshulman@shbllp.com; rodea@shbllp.com
5

6 Attorneys for John M. Wolfe,
Chapter 7 Trustee
7

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**
10

11 In re

12 **MURAD SHUQOM,**

13 Debtor.
14
15
16
17
18
19
20
21

Case No. 8:14-bk-14461-ES

Chapter 7

**STIPULATION EXTENDING THE
DEADLINE FOR THE TRUSTEE TO
OBJECT TO DEBTOR’S DISCHARGE**

[No Hearing Required]
[Order lodged Concurrently Herewith]

22 **TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY**
23 **JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE AND ALL INTERESTED**
24 **PARTIES:**

25 John M. Wolfe (“Trustee”), the duly appointed, qualified and acting Chapter 7 trustee for
26 the bankruptcy estate of Murad Shuqom (“Debtor”) on one hand, and the Debtor on the other
27 hand, by and through their counsel – together with Frank M. Cadigan on behalf of the United
28 States Trustee (“UST”) – hereby agree and stipulate based on the following recitals:

RECITALS

The Debtor filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code on July 18, 2014 in the United States Bankruptcy Court, Central District, Santa Ana Division, commencing Case No. 8:14-bk-14461-ES.

John M. Wolfe is the duly appointed and acting Chapter 7 trustee for the Debtor's bankruptcy estate ("Estate").

The Debtor has been unable to provide all requested documentation, facts, and information requested by the Trustee and his counsel. Once this information is provided, the Trustee and his counsel require additional time to review same – including potential requests for additional support documentation related to same. As such, the Trustee needs additional time to determine whether it is appropriate to file a complaint against the Debtor objecting to his discharge.

WHEREFORE, the Trustee, the UST, and the Debtor agree, subject to Court approval to extend the deadline for the Trustee to file a timely complaint under 11 U.S.C. Section 727 for approximately sixty (60) days from January 14, 2015 up to and including March 16, 2015.

IT IS SO STIPULATED AND AGREED.

SHULMAN HODGES & BASTIAN, LLP

Dated: December 12, 2014

By: /s/ Ryan D. O'Dea
Leonard M. Shulman
Ryan D. O'Dea
Attorneys for John M. Wolfe, Chapter 7
Trustee for the bankruptcy estate of Murad Shoqum

OFFICE OF THE UNITED STATES TRUSTEE

Dated: December 12, 2014

By: 
Frank M. Cadigan
Assistant United States Trustee

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

HIGBEE & ASSOCIATES

Dated: December 15, 2014

By: Melissa Clark
Melissa Clark
Counsel for Debtor, Murad Shoqum

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
8105 Irvine Center Drive, Suite 600, Irvine CA 92618.

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION EXTENDING THE DEADLINE FOR THE TRUSTEE TO OBJECT TO DEBTOR'S DISCHARGE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 12/15/2014, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On 12/15/2014, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 12/15/2014, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PERSONAL DELIVERY: Honorable Erithe Smith, USBC, 411 W. Fourth St, Bin beside 5th floor elevators/Ctrrm 5A, Santa Ana, CA 92701

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/15/2014 Laurie Verstegen
Date Printed Name

/s/ Laurie Verstegen
Signature

PROOF OF SERVICE (cont'd)

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Frank Cadigan frank.cadigan@usdoj.gov
- Melissa A Clark bk_hearings@higbeeassociates.com, mclark@firstsourcelaw.com
- Franklin S Davidson seth@sethdavidsonlaw.com
- Michael Jones mike@mjthelawyer.com, michaeljonesmyecfmail@gmail.com
- Paul J Kurtzhall paul@hkwlpl.com, scottm@hkwlpl.com
- Melissa Davis Lowe mdavis@shbllp.com, lverstegen@shbllp.com
- Jarrod Y Nakano jarrod@mcfarlinlaw.com, connie@mcfarlinlaw.com
- Neal Salisian neal.salisian@salisianlee.com, ECF@salisianlee.com
- Leonard M Shulman lshulman@shbllp.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- John M Wolfe (TR) john.wolfe@txitrustee.com, ecf.alert+jmwolfe@titlexi.com
- Helen Wong helenwong.law@gmail.com