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6 Attorneys for John M. Wolfe,  
Chapter 7 Trustee  
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8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**  
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11 In re

12 **MURAD SHUQOM,**

13 Debtor.  
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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, and together with Frank M. Cadigan on behalf of the United  
28 States Trustee (“UST”), hereby agree and stipulate based on the following recitals:

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**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").

Pursuant to previous stipulations filed with this Court, the last day for the Trustee to file a complaint for non-dischargeability against the Debtor has been extended to March 16, 2015.

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 and/or the UST to file a timely complaint under 11 U.S.C. Section 727 for approximately sixty (60) days from March 16, 2015 to May 22, 2015.

**IT IS SO STIPULATED AND AGREED.**

**SHULMAN HODGES & BASTIAN, LLP**

Dated: March 6, 2015

By:           /s/ Melissa Davis Lowe            
Leonard M. Shulman  
Melissa Davis Lowe  
Attorneys for John M. Wolfe, Chapter 7  
Trustee for the bankruptcy estate of Murad Shuqom

**OFFICE OF THE UNITED STATES TRUSTEE**

Dated: ~~February~~ <sup>March</sup> 6, 2015

By:           Frank M. Cadigan            
Frank M. Cadigan  
Assistant United States Trustee

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**HIGBEE & ASSOCIATES**

Dated: ~~February~~ <sup>March 6<sup>th</sup></sup>, 2015

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

## 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:  
100 Spectrum 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 3/6/2015, 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 3/6/2015, 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 3/6/2015, 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 5<sup>th</sup> 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.

3/6/2015  
Date

Laurie Verstegen  
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
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- John M Wolfe (TR) john.wolfe@txitrustee.com, ecf.alert+jmwolfe@titlexi.com
- Helen Wong helenwong.law@gmail.com