

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

IN RE:

PANTHERA ENTERPRISES, LLC

Case No. 19-00787

Debtor.

Chapter 7

**MOTION TO EXTEND TIME TO ASSUME OR REJECT LEASE WITH
PANTHERA TRAINING, LLC**

Now comes, Aaron C. Amore, Chapter 7 Trustee, for the Estate of Panthera Enterprises, LLC (“Debtor”) by his attorney, Aaron C. Amore, Esq., of Amore Law, PLLC and moves for an extension of time in which to assume or reject the lease of Panthera Training, LLC Court pursuant to 11 U.S.C. § 365(a). The deadline for assumption or rejection is September 28, 2020.

The Debtor is the lessor of certain real property to Panthera Training, LLC for the use of its real and personal property that form the basis of the Estate property. This is a non-residential lease agreement. See Exhibit A.

There is currently pending an adversary proceeding (19-ap-51) involving claims made by the Debtor-in-Possession in the prior chapter 11 case claiming a breach of the lease agreement by Panthera Training, LLC. The Trustee has engaged an auditor in an effort to determine if the lease agreement has been breached. The primary claims relate to the failure to pay over excess profits from the work subcontracted and done on the Debtor’s property. The audit which should be completed within the next thirty to forty-five (30-45) days.

Wherefore, the Trustee requests this Court grant his request for an extension of time to assume or reject the lease to Panthera Training, LLC for a period of Sixty (60) days.

Aaron C. Amore, Trustee
Panthera Enterprises, LLC
By counsel

/s/ Aaron C. Amore
Aaron C. Amore, Esq. WVSB# 6455
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION TO EXTEND TIME TO ASSUME OR REJECT LEASE was served upon the following individuals at the addresses listed below, by placing a true and correct copy thereof in the United States mail, postage prepaid or via email or CM/ECF, on this 28th day of September 2020.

Electronically via E-mail:

John P. Lantzy	jlantzy@sek.com
Kelly T. Smith	ksmith@sek.com

Electronically via CM/ECF:

Debra Lee Allen dallen@spilmanlaw.com

- **Aaron C. Amore** aaron@amorelaw.com,
jackie@amorelaw.com; c.ar70274@notify.bestcase.com; alaina@amorelaw.com
- **Aaron C. Amore** amorewvt@gmail.com,
aca@trustesolutions.net; jackiewvt@gmail.com; annwvt@gmail.com

- **Robert S. Bernstein** rbernstein@bernsteinlaw.com, cwirick@bernsteinlaw.com; cwirick@ecf.courtdrive.com; rbernstein@ecf.courtdrive.com
- **Elizabeth B. Carroll** elizabeth_carroll@vawb.uscourts.gov
- **Julia A. Chincheck** jchincheck@bowlesrice.com
- **Spencer D. Elliott** selliott@lgcr.com
- **Douglas Kahle** dkahle@basnightkinser.com
- **Gary O. Kinder** gary.o.kinder@usdoj.gov
- **Travis Alan Knobbe** tknobbe@spilmanlaw.com, dambrose@spilmanlaw.com
- **Sabrina B. Lee** sabrina_lee@vawb.uscourts.gov
- **William J. Leon** jayleon@comcast.net
- **Salene Rae Mazur Kraemer** skraemer@bernsteinlaw.com, salene@ecf.courtdrive.com,
- **John J. Richardson** jrichardson@bernsteinlaw.com
- **Zachary James Rosencrance** zrosencrance@bowlesrice.com, ajones@bowlesrice.com
- **Anita M. Swaton** Anita_Swaton@wvnb.uscourts.gov
- **United States Trustee** ustpreion04.ct.ecf@usdoj.gov
- **Eric Michael Wilson** eric.m.wilson@wv.gov, lora.l.rutledge@wv.gov

The following individuals have not been served via U.S. Mail as two prior motions by the Trustee resulted in all mail being returned to the Trustee as undeliverable due to incomplete addresses:

Rob Duncan
Manager/Duncan Development Group, LLC

Rob Duncan
Manager/TR&L, LLC,
a Virginia Limited Liability Company
Successor to SMI, LLC,
a Virginia Limited Liability Company

Bruce Hardy
Stacie Hardy
Anthony McIntyre
Timothy Miller

/s/ Aaron C. Amore
Aaron C. Amore