

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

In re:

**PANTHERA ENTERPRISES, LLC,
Debtor**

**BK No. 2:19-bk-00787
Chapter 7**

**AARON C. AMORE, WEST VIRGINIA
ECONOMIC DEVELOPMENT
AUTHORITY, and PANTHERA
TRAINING, LLC,**

Plaintiffs

v.

AP No. 2:21-ap-00002

**TR&L, LLC AND SMI, LLC, THERESA
MORGOGNONE, JAMES PUNELLI,
RAYMOND JONES, PANTHERA
TRAINING CENTER LLC and
PANTHERA WORLDWIDE LLC,
Defendants.**

**MOTION SHORTEN TIME PERIOD TO OBJECT TO
COMPROMISE/SETTLE ADVERSARY PROCEEDING AND RESOLVE
PENDING OBJECTIONS TO TRUSTEE'S MOTION TO SELL REAL
PROPERTY BY SMI, LLC, TR&L, LLC AND AZADIAN GROUP, LLC**

Comes now Aaron A. Amore, Chapter 7 Trustee ("Trustee") and moves the Court for approval to shorten the time period to object to the motion to compromise/settle and settlement of certain claims as between these parties pursuant to 11 U.S.C. §§ 105, 541, 704, and Fed. R. Bankr. P. 2002, and 9019 to Sixteen (16) days from the service of the motion on June 2, 2021.

The Trustee's motion to sell has been pending since March 29, 2021 with an initial hearing set on April 22, 2021. The matter was continued over eventually until June 22, 2021 to accommodate a mediation related to certain objections. Three objections were filed to the motion to sell with one being a limited objection not to the sale itself but to the disposition of proceeds. The adversary proceeding sought to be resolved (21-ap-2) involves the avoidance of certain transfers and declaratory relief as to SMI, LLC, TR&L, LLC and Theresa Morgoglione. These same issues formed the basis of an objection by TR&L, LLC to the Trustee's motion to sell.

The mediation has resulted in the resolution of objections by TR&L, LLC and Azadian Group, LLC. The objection of the Williams remains as of the filing of this motion and is ripe for hearing by this Court on June 22, 2021.

Wherefore, the Trustee asks this Court for an order granting this Motion to shorten the time period to object to his motion Compromise/Settle the claims as set forth hereinabove.

Respectfully Submitted
Aaron C. Amore, Trustee
By Counsel:

/s/ Aaron C. Amore
Aaron C. Amore, WVSB No. 6455
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing ***MOTION SHORTEN TIME PERIOD TO OBJECT TO COMPROMISE/SETTLE ADVERSARY PROCEEDING AND RESOLVE PENDING OBJECTIONS TO TRUSTEE'S MOTION TO SELL REAL PROPERTY BY SMI, LLC, TR&L, LLC AND AZADIAN GROUP, LLC*** was served upon the following individuals at the addresses listed below, via CM/ECF and/or email on this 3rd day of June 2021 to the following:

Via Email:

Kelly T. Smith ksmith@sek.com

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Rob Duncan as manager of TR&L tkelsey@woodsrogers.com

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CM/ECF

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Manual Notice List

Notice was not mailed to the parties below as no addresses were provided. To the extent the Trustee has email addresses the below notice parties, they were emailed.

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, Esq.