

RIMON P.C.
Counsel to the Chapter 7 Trustee
Kenneth P. Silverman, Esq.
100 Jericho Quadrangle Suite 300
Jericho, New York 11753
Brian Powers
Courtney M. Roman

Hearing Date: September 26, 2024
Time: 10:00 a.m.

Objections Due: September 19, 2024
Time: 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re:

Chapter 7

BUTH-NA-BODHAIGE, INC.,

Case No.: 24-10392 (DSJ)

Debtor.

-----X

**CERTIFICATE OF NO OBJECTION TO CHAPTER 7
TRUSTEE’S MOTION IN FURTHER SUPPORT OF
THE COURT’S PREVIOUSLY ENTERED BIDDING PROCEDURES ORDER**

Pursuant to 28 U.S.C. § 1746, Rimon P.C., attorneys for Kenneth P. Silverman, Esq., the chapter 7 trustee (the “Trustee”) for the bankruptcy estate of Buth-Na-Bodhaige, Inc. (the “Debtor”), respectfully represents and certifies as follows:

1. On September 5, 2024, the Trustee filed a motion (the “Motion”) in further support of the Court’s Bidding Procedures Order (as defined herein) and the Trustee’s proposed sale of the Real Property (defined herein), pursuant to sections 105, 363, 503, and 554 of chapter 11 of title 11, United States Code (the “Bankruptcy Code”), and Rules 2002, 6004, 9006 and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), annexed thereto as **Exhibit A**: (i) deeming any and all personal property of non-Debtor parties remaining in the Real Property as of the termination of the License Agreement (defined herein) (collectively, the “Remnant Personal Property”) abandoned to the Debtor; (ii) authorizing the Trustee to dispose of the Remnant Personal Property in the most cost effective manner, including but not limited to sale, destruction,



donation, or abandonment of the Remnant Personal Property; and (iii) granting such other, further, and different relief as this court deems just and proper (ECF Doc. No. 105).

2. On September 5, 2024, the Trustee's claims and noticing agent, Kurtzman Carson Consultants ("KCC") served the Trustee's Notice of Hearing on the Motion, which provided for a hearing date of September 26, 2024, at 10:00 a.m. (ECF Doc. No. 105) (the "Notice").

3. On September 5, 2024, KCC served the Motion and Notice on: (i) the Debtor and its counsel; and (ii) the Office of the United States Trustee, and all interested parties indicating that objections to the Motion were due to be filed no later than September 19, 2024 (the "Objection Deadline"). On September 12, 2024, a Certificate of Mailing of Claims Agent evidencing service of the Motion and the Notice was filed. (ECF Doc. No. 110).

4. The Objection Deadline has passed and (i) the Motion was filed and served in a timely fashion, (ii) no objection has been filed or served on the movant, (iii) there is no objection, responsive pleading or request for a hearing with respect to the Motion on the docket, and (iv) the Trustee is not aware of any informal objection.

5. I have neither received nor spoken with any party-in-interest that expressed any objection to the granting of the Motion and the relief requested therein.

6. Based on the foregoing, the undersigned counsel for the Trustee hereby certifies that no objections have been filed with respect to the granting of the Motion and the relief requested therein. Consequently, the Trustee hereby requests that this Court (i) enter the attached order granting the Motion; and (ii) mark off the hearing scheduled for September 26, 2024 at 10:00 a.m.

Dated: Jericho, New York
September 23, 2024

RIMON P.C.
Attorneys for Kenneth P. Silverman, Esq.,
Chapter 7 Trustee

By: s/ Brian Powers
Brian Powers
Partner
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-630