

**RIMON P.C.**  
Counsel to the Chapter 7 Trustee  
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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

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In re:

Chapter 7

BUTH-NA-BODHAIGE, INC.,

Case No.: 24-10392 (DSJ)

Debtor.

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**CERTIFICATE OF NO OBJECTION TO CHAPTER 7 TRUSTEE’S MOTION  
FOR AN ORDER APPROVING SETTLEMENT PROVIDING FOR  
(I) WAIVER OF CLAIMS, AND (II) ABANDONMENT OF PERSONAL  
PROPERTY PURSUANT TO 11 U.S.C. § 554 AND BANKRUPTCY RULE 6007**

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 4, 2024, the Trustee filed a motion (the “Motion”) seeking entry of an order, substantially in the form annexed thereto as **Exhibit A** pursuant to section 105(a) of title 11, United States Code (the “Bankruptcy Code”) and Federal Rule of Bankruptcy Procedure (the “Bankruptcy Rules”) 9019(a) approving the Trustee’s stipulation (the “Stipulation”) with Denver International Airport (“DIA”) annexed thereto as **Exhibit B**, which provides for (i) the abandonment of the Debtor’s personal property pursuant to § 554 of the Bankruptcy Code and Bankruptcy Rule 6007, (ii) DIA’s waiver of any and all claims to be asserted against the Debtor’s estate, and (iii) for such further relief as the Court deems proper (ECF Doc. No. 104).



2. On September 4, 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. 104) (the "Notice").

3. On September 4, 2024, KCC served the Motion and Notice on: (i) the Debtor and its counsel; (ii) DIA's counsel, and (iii) 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. 109).

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.**  
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Chapter 7 Trustee

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