

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
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In re: CASE NO.: 04-35435-BKC-PGH
eCom eCom.com, Inc., Chapter 11
Debtor.

DEBTOR'S *EX-PARTE* AGREED MOTION TO (A) SHORTEN PERIOD WITHIN WHICH THE UNITED STATES TRUSTEE HAS TO FILE OBJECTIONS TO DEBTOR'S FINAL REPORT OF ESTATE AND MOTION FOR FINAL DECREE CLOSING CASE AND (B) TO SCHEDULE HEARING ON MOTION FOR FINAL DECREE CLOSING CASE

(Telephonic Hearing Requested for 03/28/08)

eCom eCom.com, Inc. (the "**Debtor**"), by and through undersigned counsel, and pursuant to Fed.R. Bank. P. 9006(c), requests the entry of an Order, on an *ex-parte* basis, shortening the time within which the United States Trustee has to file an objection to the *Debtor's Final Report of Estate and Motion for Final Decree Closing Case* (the "**Final Report**") (C.P. #361) and scheduling a hearing on the Final Report on this Court's March 28, 2008 calendar, and, in support thereof, states as follows:

1. On January 28, 2008, the United States Trustee ("**UST**") filed a Motion to Dismiss the Bankruptcy Case (C.P. #355) due primarily to the delay in filing the Final Report (the "**Trustee Motion**").
2. On March 12, 2008, the Debtor filed the Final Report.
3. On March 14, 2008, the UST withdrew the Trustee Motion. *See* C.P. #362.
4. The deadline for the UST to file an objection to the Final Report is April 11, 2008.

5. In light of the April 11, 2008 deadline, the Debtor will incur additional fees for the second quarter, 2008 pursuant to 28 U.S.C. § 1930(a)(6).

6. **Undersigned counsel has forwarded the Final Report to the UST, and the UST has no objections to the Final Report or to the entry of a final decree closing this case. The Debtor is current on UST fees and in filing monthly operating reports and affidavit(s) of disbursements.**

7. The Debtor submits that Bankruptcy Rule 9006(c) authorizes this Court, for cause shown, to reduce the period of time for the UST to object to the Final Report.

8. By this motion, the Debtor requests that the Court enter an order (i) reducing the thirty day (30) notice period for the UST to file an objection to the Final Report to fifteen (15) days, and (ii) setting the Final Report for hearing on this Court's March 28th calendar.

9. **Undersigned counsel has conferred with the UST's office, and the UST has no objection to the relief requested in the instant Motion.**

10. A form proposed order is attached hereto as **Exhibit "A."**

WHEREFORE, the Debtor respectfully requests that the Court enter an order, on an *ex-parte* basis, (i) shortening the time for the UST to file an objection to Final Report to fifteen (15) days; (ii) scheduling a hearing on the Final Report for March 28, 2008; and (iii) granting any further relief as this Court deems appropriate under the circumstances.

I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this Court set forth in Local Rule 2090-1(A).

Respectfully Submitted,

KLUGER, PERETZ, KAPLAN & BERLIN, P.L.
Attorneys for the Debtor
Miami Center, Seventeenth Floor
201 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 379-9000
Facsimile: (305) 379-3428

By: /s/ Eyal Berger

Michael D. Seese
Florida Bar No. 997323
mseese@kpkb.com
Eyal Berger
Florida Bar No. 11069
eberger@kpkb.com