

In re:

ASSIGNMENT FOR BENEFIT OF CREDITORS
OF:

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN
AND FOR MIAMI-DADE COUNTY,
FLORIDA

PROPER BSD, LLC, a Colorado limited liability
company

Assignor,

To:

NIR GAVRA,

Case No. 2023-018976-CA-01

Division: CA44

Assignee

ASSIGNEE'S MOTION FOR EXTENSION OF TIME TO FILE FINAL REPORT

Assignee Nir Gavra (the "Assignee"), files this motion to extend time to file final report and states:

1. On December 2, 2024, the Cour entered its Third Scheduling Order which directed the Assignee to file a final report and any claim objections by January 15, 2025.
2. On January 15, 2025, the Assignee filed a motion for an extension of the deadline through January 22, 2025.
3. On January 22, 2025, the Assignee filed 9 omnibus objections to claim, seeking the reclassification, reduction and/or disallowance of over 75 proofs of claim.
4. The Assignee cannot file a final report until these claim objections are resolved.
5. Accordingly, the Assignee requests an extension of the deadline to file a final report until 14 days after the claim objections have been resolved.

WHEREFORE, the Assignee requests the Court enter an Order: (a) extending the deadline for the Assignee to file a final report as set forth above; and (b) granting such further relief as is just and proper.

Respectfully submitted,

/s/ Michael S. Hoffman

Michael S. Hoffman, Esq.

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