

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov**

In re:

SURGE TRANSPORTATION, INC.

Chapter 11

Case No. 3:23-ap-00085-JAB

Debtor.

**COUNSEL FOR ADVERSARY PLAINTIFFS' MOTION TO ALLOW ZOOM APPEARANCE
AT JUNE 4, 2024 EVIDENTIARY HEARING ON DISCLOSURE STATEMENT**

David J. Jencks of Jencks Law, P.C., (“**Movant**”), counsel for the Adversary Plaintiffs WEX Bank, Phoenix Capital Group, Integra Funding Solutions, iThrive Financial, and Yankton Factoring, Inc. hereby files this Motion to Allow his appearance remotely via Zoom at the Evidentiary Hearing on Disclosure Statement scheduled in this case on June 4, 2024 at 11:00 a.m.

(the “**Hearing**”). In support of this Motion, Movants state:

BACKGROUND

1. Jencks Law, P.C., represents 5 adversary Plaintiffs in this matter.
2. Pursuant to the Notice Scheduling the Hearing on May 21, 2024 [DE 727], the Hearing is being held in regard to the Evidentiary Hearing on Disclosure Statement.
3. David J. Jencks is requesting to appear via Zoom due to the fact that he resides out of state and is attending another pre-trial conference in an unrelated matter.

RELIEF REQUESTED

4. Movant is requesting that he be allowed to appear remotely via Zoom at the Preliminary Hearing scheduled in this case on June 4, 2024 at 11:00 a.m.

WHEREFORE, Movant requests that this Court enter an order (i) allowing David J. Jencks to appear at the Hearing on June 4, 2024 via Zoom; and (ii) granting such other relief as is just and proper under the circumstances.

Dated: June 3, 2024.

Respectfully submitted,

JENCKS LAW, P.C.

By: /s/ David J. Jencks

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Funding Solutions, Yankton Factoring and iThrive

Financial, *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of June, 2024, a true and correct copy of the foregoing has been filed and served via the CM-ECF filing system which will send notification to those registered recipients.

/s/ David J. Jencks
Attorney