

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION**  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

In re:

Landmark Holdings of Florida, LLC,  
  
Reorganized Debtor.

Chapter 11

Case No. 2:25-bk-00397

**JOINT MOTION OF REORGANIZED DEBTORS AND GUC TRUSTEE  
TO EXTEND THE CLAIMS OBJECTION DEADLINE**

The Reorganized Debtors<sup>1</sup> and the GUC Trustee, through their undersigned counsel, file this joint motion (the “Motion”), seeking entry of an order, substantially in the form attached hereto as Exhibit A (the “Order”), extending the Claims Objection Deadline by 180 days, from June 10, 2026, through and including December 7, 2026, without prejudice to the rights of the Reorganized Debtors and/or the GUC Trustee to request further extensions of the Claims Objection Deadline. In support of the Motion, the Reorganized Debtors and the GUC Trustee submit as follows:

**I. Jurisdiction, Venue, and Predicates for Relief**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this Court under 28 U.S.C. §§ 1408 and 1409.
2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
3. The bases for the relief requested herein are section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), and rule 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

---

<sup>1</sup> Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the *Third Amended Joint Chapter 11 Plan For Landmark Holdings of Florida, LLC and Its Debtor Affiliates* [Docket No. 417] (the “Plan”).

## II. Background

4. On March 9, 2025 (the “Petition Date”), each of the Debtors filed voluntary petitions under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”).

5. On October 9, 2025, the Court entered the *Order Approving Disclosure Statement and Confirming Third Amended Chapter 11 Plan of Landmark Holdings of Florida, LLC and Its Debtor Affiliates* [Docket No. 421] (the “Confirmation Order”), confirming the *Third Amended Joint Chapter 11 Plan for Landmark Holdings of Florida, LLC and Its Debtor Affiliates* [Docket No. 417] (the “Plan”). The Confirmation Order is final and non-appealable.

6. On December 12, 2025, the Plan was substantially consummated and the Effective Date occurred. *See Notice of Occurrence of Effective Date* [Docket No. 486].

## III. Claim Objection and Reconciliation Process

7. Pursuant to the Confirmation Order and the Plan, on the Effective Date, the GUC Trust was established to receive and liquidate the GUC Trust Assets and to make distributions to holders of Allowed General Unsecured Claims. Confirmation Order at 20; Plan Art. IV, § 4.23. The GUC Trust is administered by the GUC Trustee pursuant to the GUC Trust Agreement. *Id.*

8. The Plan authorizes the Reorganized Debtors and the GUC Trustee, as applicable, to, among other things, (1) file objections to Claims, (2) settle, compromise, or otherwise resolve Disputed Claims, and (3) administer and adjust the applicable Claims Register. *See Plan* § 7.3.

9. The Plan provides that the deadline for filing objections to Claims is the later of (1) 180 days after the Effective Date and (2) such other period of limitation as may be fixed by the Bankruptcy Court. *See Plan* §§ 1.27, 6.3. The Effective Date occurred on December 12, 2025, making the Claims Objection Deadline the later of (1) June 10, 2026 and (2) such later date as may be fixed by the Bankruptcy Court. The Reorganized Debtors and the GUC Trustee jointly file this Motion seeking a later date to be fixed by the Bankruptcy Court. The Plan further provides that

the “filing of a motion to extend the Claims Objection Deadline shall automatically extend the Claims Objection Deadline until a Final Order is entered on such motion.” *See* Plan § 7.5.

10. Since the Effective Date, the Reorganized Debtors and the GUC Trustee each have engaged in the review and reconciliation of Claims. Additionally, the Reorganized Debtors and the GUC Trustee have, where possible, worked to consensually resolve Disputed Claims. However, neither the Reorganized Debtors nor the GUC Trustee have completed their review of Claims or the reconciliation of Claims and potentially Disputed Claims.

11. While the Reorganized Debtors and the GUC Trustee have worked diligently to complete the claims resolution process, additional time past the current June 10, 2026 deadline is required to complete a thorough reconciliation of Claims. The Reorganized Debtors and the GUC Trustee conferred regarding the need for an extension of the Claims Objection Deadline and believe that a 180-day extension is necessary and appropriate under the circumstances.

12. Accordingly, the Reorganized Debtors and the GUC Trustee request a 180-day extension of the Claims Objection Deadline from June 10, 2026, through and including December 7, 2026, without prejudice to any request for a further extension.

#### **BASIS FOR RELIEF**

13. Section 105(a) of the Bankruptcy Code provides that the Court may issue an order that is necessary or appropriate to carry out the provisions of the Bankruptcy Code. 11 U.S.C. § 105(a). Pursuant to Bankruptcy Rule 9006(b)(1), “when an act is required or allowed to be done at or within a specified period . . . by order of the court, the court for cause may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefore is made before the expiration of the period originally prescribed.” Fed. R. Bankr. P. 9006(b). As set forth above, the Plan also expressly contemplates that the Court may extend the Claims Objection Deadline past June 10, 2026. *See, e.g.*, Plan, Art. I(A); § 7.5.

14. To allow the Reorganized Debtors and the GUC Trustee sufficient time to review the Claims asserted against the Debtors, the Reorganized Debtors and the GUC Trustee respectfully request a 180-day extension of the June 10, 2026, Claims Objection Deadline, through and including December 7, 2026. The Reorganized Debtors and the GUC Trustee believe such an extension is in the best interest of all parties and will permit the Reorganized Debtors and the GUC Trustee to more efficiently complete the reconciliation process. For example, the additional time will permit the Reorganized Debtors and the GUC Trustee to consensually resolve many Disputed Claims and to otherwise further investigate and reconcile Disputed Claims, rather than requiring that they go ahead and object to Claims by the current Claims Objection Deadline.

15. The requested extension will also ensure that the Reorganized Debtors and the GUC Trustee do not unnecessarily forfeit valid defenses to Claims, do not expend resources in objecting to Claims that could otherwise be resolved consensually, and do not otherwise permit Claims to be allowed in amounts that are not justified. Accordingly, the Reorganized Debtors and the GUC Trustee respectfully submit that a 180-day extension of the June 10, 2026, Claims Objection Deadline is authorized by the Bankruptcy Code and the terms of the Plan, and should be granted.

**NOTICE**

16. The Reorganized Debtors and the GUC Trustee will serve notice of this Motion on (a) the U.S. Trustee; and (b) all parties that have filed a renewed request for service pursuant to Bankruptcy Rule 2002.

WHEREFORE, the Reorganized Debtors and the GUC Trustee respectfully request that the Court enter the Order, substantially in the form attached hereto, granting the relief requested herein and such other and further relief as the Court deems just and proper.

*[Remainder of page intentionally left blank]*

Dated: June 9, 2026

Respectfully submitted,

/s/ Jennifer E. Wuebker

**HUNTON ANDREWS KURTH LLP**

Jamie Z. Isani (FL 728861)

333 SE 2nd Avenue, Suite 2400

Miami, Florida 33131

Telephone: (305) 810-2500

Facsimile: (305) 810-2460

Email: jisani@hunton.com

- and -

Justin F. Paget (admitted *pro hac vice*)

Jennifer E. Wuebker (admitted *pro hac vice*)

951 E. Byrd Street

Richmond, Virginia 23219

Telephone: (804) 788-8200

Facsimile: (804) 788-8218

Email: jpaget@hunton.com

jwuebker@hunton.com

*Counsel to the Reorganized Debtors*

/s/ John D. Elrod

John D. Elrod, Fla. Bar No. 0615013

Allison J. McGregor (admitted *pro hac vice*)

GREENBERG TRAURIG, LLP

3333 Piedmont Road, NE, Suite 2500

Atlanta, Georgia 30305

Telephone: (678) 553-2259

Email: ElrodJ@gtlaw.com

Allison.Mcgregor@gtlaw.com

*Counsel to the GUC Trustee*

**Exhibit A**

Proposed Order

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION**  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

In re:

Landmark Holdings of Florida, LLC,  
  
Reorganized Debtor.

Chapter 11

Case No. 2:25-bk-00397

**ORDER EXTENDING CLAIMS OBJECTION DEADLINE**

Upon the joint motion (the “Motion”)<sup>1</sup> of the Reorganized Debtors and the GUC Trustee seeking entry of an order (this “Order”) extending the Claims Objection Deadline, as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that this Court may enter a final order consistent with Article III of the United States Constitution; and it appearing that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that notice of the Motion and the opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and all responses, if any, to

---

<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

the Motion having been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT**:

1. The Claims Objection Deadline is hereby extended by 180 days, through and including **December 7, 2026**, without prejudice to the rights of the Reorganized Debtors and/or the GUC Trustee to seek further extension of the Claims Objection Deadline.

2. The Reorganized Debtors and the GUC Trustee are authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

3. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Counsel for the Reorganized Debtors is directed to serve a copy of this Order on interested parties who do not receive service by CM/ECF and file a proof of service within three days of entry of the Order.