

**IN THE
UNITED STATES
BANKRUPTCY COURT
FOR THE MIDDLE
DISTRICT OF ALABAMA**

**CHAPTER SEVEN
CASE NUMBER
10-30631

IN RE:
ALLEGRO LAW, LLC,
DEBTOR**

**TRUSTEE'S MOTION TO
EXTEND PETITION
DEFICIENCY DEADLINE**

COMES NOW Daniel G. Hamm, Trustee in the above styled matter and pursuant to *Rule 1007(c), Fed.R.Bankr.P.*, moves this Honorable Court to extend the deadline to file complete Petition and Schedules by a period of sixty (60) days by stating the following:

1. The Trustee of Kenneth Andrew Nelms, Chapter 7 Case Number 10-30430 filed an emergency petition for the Debtor Allegro Law, LLC on March 11, 2009. This filing was precipitated pursuant to a Court Order which authorized the Trustee to file acting on behalf of Kenneth Andrew Nelms' as the sole member interest of Allegro Law, LLC. with said Order being dated March 11, 2010.

2. On March 12, 2010, the Clerk's Office filed a *Notice of Deficiency* requiring that the deficient Petition and Schedules be filed by March 26, 2010, or suffer a dismissal of the instant case.

3. Currently all of the books and records of the Debtor, Allegro Law, LLC are in the possession of a State Court Receiver, namely Louis Colley. These documents were placed in the hands of the State Court Receiver pursuant to an Order Granting Permanent Injunction issued by Autauga County Circuit Judge Ben Fuller dated February 11, 2010, Autauga Circuit Court Civil Case Number 2009-125-F.

4. As of this writing there remains an unresolved issue as to whether or not the State Court Receiver will be required to surrender to the Trustee property including certain books and records of the Debtor, Allegro Law, LLC. The State Court Receiver continues to possess the subject items belonging to the Debtor and should the State Court Receiver be required to surrender same to the Trustee, sufficient time will be required to fully complete the Petition and Schedules that remain deficient.

5. In addition to the above, the Debtor will need to schedule a significant number of creditors that will be added to the Schedules after the aforementioned books and records are provided by the State Court Receiver.

WHEREFORE, THE ABOVE PREMISES CONSIDERED, Trustee prays that this Honorable Court will pursuant to *Rule 1007(c), Fed.R.Bankr.P.* extend the deadline to file the complete Petition and Schedules by sixty (60) days.

RESPECTFULLY SUBMITTED on Thursday the 25th day of March.

2010.

/s/ Daniel G. Hamm
DANIEL G. HAMM (HAM043)
BANKRUPTCY TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing pleading as follows:

By CM/ECF:

Teresa Jacobs, Bankruptcy Administrator
Steve Olen, Special Counsel for Trustee
George Thomas, Counsel for Louis Colley, Receiver

By fax or e-mail

By first class mail, postage prepaid:

DONE this the 25th day of March, 2010.

/s/ Daniel G. Hamm
DANIEL G. HAMM (HAM043)
BANKRUPTCY TRUSTEE