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MULLIN HOARD & BROWN, L.L.P. Brad W. Odell, SBN: 24065839

P.O. Box 2585

Lubbock, Texas 79408-2585 Telephone: 806-765-7491 Telefax: 806-765-0553

Email: bodell@mhba.com

Attorneys for Debtor, iDocket.com, LLC



#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

IN RE: **88888** iDOCKET.COM, LLC Case No. 23-20220-RLJ-11 Debtor.

#### <u>MOTION FOR EXPEDITED HEARING AND TO SHORTEN NOTICE</u> ON DEBTORS' MOTION TO APPROVE STIPULATION OF SETTLEMENT PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019

TO THE HONORABLE ROBERT L. JONES, U.S. Bankruptcy Judge:

NOW COMES iDocket.com, LLC, (the "Debtor"), the Debtor in the above-referenced bankruptcy case, and files this Motion for Expedited Hearing and to Shorten Notice on Debtor's Motion to Approve Stipulation of Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019 (the "Expedited Motion"). In support, Debtor would show the Court as follows:

- 1. The Debtor asserts that a need exists for an expedited hearing and good cause exists to reduce the notice period on its Expedited Motion.
- 2. For cause, Debtor would show that it is in the best interest of creditors and parties in interest that the hearing on the Expedited Motion be held at the same time as the confirmation hearing on Debtor's Plan which is currently scheduled for May 16, 2024. The Stipulation deals with the treatment of IncluIT's claims under the Plan and approval of the Stipulation by the Court will only further the terms of the Plan. The Debtor would show the Court that the approval of the Stipulation goes hand-in-hand with confirmation of the Plan, does not modify or change Motion for Expedited Hearing and to Shorten Notice on Emergency Motion

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any terms of the Plan, and should be heard at the same time as the hearing on confirmation of

Debtor's Plan.

3. For these reasons, the Debtors request an expedited hearing on their Expedited

Motion upon shortened notice.

4. Accordingly, pursuant to Bankruptcy Rule 9006, the Debtors seek an expedited

hearing seeking the shortening of the notice period for their Expedited Motion, so that it may be

considered and ruled upon at the same time as confirmation. The Debtor therefore requests that

the notice period for objections to its Motion be shortened from 21 days to seven (7) days, and

that a hearing on the Expedited Motion be set for Thursday, May 16, 2024 at 1:30 p.m.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays that the Court 1) set an

expedited hearing for Thursday, May 16, 2024 at 1:30 p.m.; 2) shorten the notice period for its

Expedited Motion from 21 days to seven (7) days; 3) find that such notice is adequate under the

circumstances, and 4) grant Debtor such other and further relief, at law or in equity, as the Court

may deem necessary and proper.

Respectfully Submitted,

By:

/s/ Brad W. Odell

Brad W. Odell: SBN 24065839

MULLIN HOARD & BROWN, LLP

P.O. Box 2585

Lubbock, TX 79408

Tel: 806-765-7491

Fax: 806-765-0553

Email: bodell@mhba.com

Attorneys for Debtor, iDocket.com, LLC

#### CERTIFICATE OF CONFERENCE

I, Brad Odell, the undersigned counsel for Debtors, state that on May 8, 2024, I spoke with Jordan Chavez, counsel for IncluIT, LLC, and he indicated to me he does not oppose the hearing on expedited and shortened notice.

/s/ Brad W. Odell
Brad W. Odell

#### CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served on the following parties in interest via ECF and/or regular U.S. Mail on this the 8<sup>th</sup> day of May, 2024 to the following listed parties in interest:

- iDocket.com, LLC
   Attn: Amelia Balderrama
   447 Hickory
   Hereford, Texas 79045
   ameliab@idocket.com
   Debtor
- U.S. Trustee's Office
   1100 Commerce St., Room 9C60
   Dallas, Texas 75242
- 3. Stephen M. Pezanosky
  HAYNES AND BOONE, LLP
  301 Commerce Street, Suite 2600
  Fort Worth, TX 76102
  Attorneys for IncluIT, LLC
- Jordan E. Chavez
   HAYNES AND BOONE, LLP
   2801 N. Harwood St., Suite 2300
   Dallas, TX 75201
   Attorneys for IncluIT, LLC
- 5. All parties receiving ECF Notice in this case.
- 6. All parties listed on the attached mailing matrix which is on file with this Motion, but not included in the mailing.

/s/ Brad W. Odell Brad W. Odell

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iDocket.com, LLC Attn: Amelia Balderrama 447 Hickory Hereford, TX. 79045 U.S. Trustee's Office 1100 Commerce St. Room 9C60 Dallas, TX 75242 Anderson County Clerk 500 North Church Street Palestine, TX 75801

Angelina County Clerk PO Box 908 Lufkin, TX 75902 Angelina County District Clerk 215 East Lufkin Avenue Lufkin, TX 75901 Apex Systems 3750 Collections Center Drive Chicago, IL 60693

Apollo Technology Solutions LLC 2841 Hartland Rd. Suite 205 Falls Church, VA 22043 Aransas County Clerk 2840 Highway 35 North Rockport, TX 78382 Aransas County District Clerk 2840 Texas 35 Business Rockport, TX 78382

Bandera County Clerk P.O. Box 823 Bandera, TX 78003 Bandera County District Clerk PO BOX 2688 Bandera, TX 78003 Baxture 9600 Great Hills Trail Suite 150 W Austin, TX 78759

Bee County Clerk 105 West Corpus Christi Street Beeville, TX 78102 Bee County District Clerk 105 W Corpus Christi, Room 304 Beeville, TX 78102 Bell County Clerk's office 1201 Huey Road Belton, TX 76513

Bell County District Clerk 1201 Huey Road Belton, TX 76513 Bosque County Clerk 110 South Main St Meridian, TX 76665 Bosque County District Clerk Office 110 Main Street Meridian, TX 76665

Bowie County Clerk Office 710 James Bowie Drive New Boston, TX 75570 Bowie County District Clerk 710 James Bowie Drive New Boston, TX 75570 Brazoria County District Clerk 111 East Locust Street Suite 500 Angleton, TX 77515

Brown County Clerk 200 Broadway Ste 101 Brownwood, TX 76801 Caldwell County Clerk 1703 South Colorado Street Lockhart, TX 78644 Caldwell District Clerk 1703 South Colorado St, Box 3 Lockhart, TX 78644

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Cameron County Clerk 835 East Levee Street Brownsville, TX 78520 Cameron County District Clerk 974 East Harrison Street Brownsville, TX 78520

Centennial Bank d/b/a Happy State Bank 1908 4th Ave. Canyon, TX 79015

Chase Cardmember Services P.O. Box 6294 Carol Stream, IL 60197-6204 Cherokee County District Clerk 135 South Main Street 2nd Fl Rusk, TX 75785 Christina T. Rodriguez Haynes & Boone, LLP 2323 Victory Avenue, Suite 700 Dallas, TX 75219-7672

Clay County Clerk 214 N. Main St. Henrietta, TX 76365

Coleman County Clerk 100 West Live Oak Street Suite 105 Coleman, TX 76834 Coleman County District Clerk 100 Liveoak Ste 201 Coleman, TX 76834

Colorado County Clerk 318 Spring Street, Ste 103 Columbus, TX 78934

Colorado County District Clerk 400 Spring St., Suite 103 Columbus, TX 78934 Cooper Consulting Company 1705 Crossing Place Unit 101A Austin, TX 78741

Coryell County Clerk 620 East Main Street Gatesville, TX 76528

Crane County Clerk 201 West 6th Street Crane, TX 79731 Crestline Solutions, LLC 2505 Bluffview Drive Austin, TX 78704-5824

Culberson County & District Clerk PO Box 158 Van Horn, TX 79855

Dallas County Clerk 1201 Elm Street Dallas, TX 75270 Deaf Smith County Appraisal District 140 E. 3rd Street Hereford, TX 79045-5597

Deaf Smith County Clerk 235 E 3rd St Room 203 Hereford, TX 79045

Decisions, LLC 4588 Virginia Beach Blvd Suite 104 Virginia Beach, VA 23462 Delta County & District Clerk 200 W. Dallas Ave. Cooper, TX 75432

Department of Workforce Development P.O. Box 7945 Madison, WI 53707 Dickens County and District Clerk PO Box 120 Dickens, TX 79229 Duval County District Clerk 400 East Gravis Avenue San Diego, TX 78384

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Eastland County Clerk 100 West Main Street Ste 102 Eastland, TX 76448 El Paso City Tax Assessor-Collector P.O. Box 2992 El Paso, TX 79999-2992 El Paso County Clerk Attn: Jennifer Valles 500 E. San Antonio, Suite 105 El Paso, TX 79901

Floyd County Clerk 105 S. Main St Room 101 Floydada, TX 79235 Floyd District Clerk 105 S. Main Room 207 Floydada, TX 79235 Franklin District Clerk PO BOX 750 Mount Vernon, TX 75457

Galveston Co. District Clerk 600 59th Street Ste. 4001 Galveston, TX 77551 Galveston County Clerk 600 59th St. Ste 2001 Galveston, TX 77551

Hays County Clerk 712 S Stagecoach Trail Ste. 1094 San Marcos, TX 78666

Hays County District Clerk 712 South Stagecoach Trail Ste. 1094 San Marcos, TX 78666 Hidalgo County Clerk 100 North Closner Boulevard Edinburg, TX 78541 Houston County Clerk 401 E. Houston Ave. Crockett, TX 75835

Houston County District Clerk 401 East Houston Avenue Crockett, TX 75835 Hunt County Clerk Office 2507 Lee Street Room 201 Greenville, TX 75403 IncluIT 1065 SW 8<sup>th</sup> PMB 622 Miami, FL 33130

Internal Revenue Service Special Procedures - Insolvency P.O. Box 7346 Philadelphia, PA 19101-7346

Internal Revenue Service 1100 Commerce St. MC 5027 DAL Dallas, TX 75242-1100 Irion County & District Clerk PO Box 270 Mertzon, TX 76941

Jack County Clerk 100 N Main St. Ste 208 Jacksboro, TX 76458 Jack County District Clerk 100 N Main St., Ste 310 Jacksboro, TX 76458 Jackson County District Clerk 115 W. Main Room 203 Edna, TX 77957

Jefferson District Clerk 1001 Pearl St., Suite 203 Beaumont, TX 77701 Jim Hogg County & District Clerk PO Box 878 Hebbronville, TX 78361 Jim Wells County District Clerk PO Drawer 2219 Alice, TX 78333

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Kelly Latz Fritz Byrne, PLLC 402 West Seventy Street Austin, TX 78701

Kimble County & District Clerk 501 Main St. Junction, TX 76849 Kinney County & District Clerk P.O. Box 9 Brackettville, TX 78832

Liberty County Clerk PO Box 369 Liberty, TX 77575 Liberty County District Clerk 1923 Sam Houston Street Liberty, TX 77575 Limestone County Clerk 200 West State Street Groesbeck, TX 76642

Limestone County District Clerk 200 W. State St, Ste 206 Groesbeck, TX 76642 Massachusetts Dept. of Revenue Audit Div. P.O. Box 7044 Boston, MA 02204

McLennan County District Clerk 219 N. 6th Suite 300 Waco, TX 76701

Michigan Dept of Treasury Collection Ser. P.O. Box 30199 Lansing, MI 48909-7699

Microassist, Inc. 8500 Shoal Creek Blvd. 4-225 Austin, TX 78757 Milam County Clerk 806 N. Crockett St Suite A Cameron, TX 76520

Milam County District Clerk 102 South Fannin Avenue Suite 5 Cameron, TX 76520 Minnesota Revenue 600 Robert St. N. Saint Paul, MN 55101 Montgomery County Clerk PO BOX 959 Conroe, TX 77305

Nacogdoches County Clerk 101 W Main St Nacogdoches, TX 75961

Nacogdoches County District Clerk 101 West Main, Suite 120 Nacogdoches, TX 75961 NerdRabbit, LLC 130 Technology Parkway Suite 200 Norcross, GA 30092

New York State Unemployment Insurance P.O. Box 4301 Binghamton, NY 13902-4301 Newtek Bank 1981 Marcus Avenue Suite 130 Lake Success, NY 11042 NYS Workers Compensation Board Attn: Finance Office 328 State Street, Room 131 Schenectady, NY 12305-2302

Office of Court Administration P.O. Box 12066 Austin, TX 78711-2066 Orange County District Clerk 801 West Division Street Orange, TX 77630 OwnBackup, Inc. 940 Sylvan Avenue, Floor 1 Englewood Cliffs, NJ 07632

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PDFTron, Apryse Software Inc. Box 500-838 West Hastings Street Vancouver BC V6C 0A6 **CANADA** 

Polk County Clerk Office 101 W MILL ST, SUITE 265 Livingston, TX 77351

Polk County District Clerk 101 West Mill Street Livingston, TX 77351

PolyCloud 22798 Milltown Farm Court Ashburn, VA 20148

Robertson County Clerk **PO BOX 944** Franklin, TX 77856

Rusk County District Clerk 115 N. Main St Suite 301 Henderson, TX 75652

Salesforce.com, Inc. P.O. Box 203141 Dallas, TX 75320

San Patricio County Clerk 400 West Sinton Street Room 124 Sinton, TX 78387

San Patricio County District Clerk 400 West Sinton Street Room 210 Sinton, TX 78387

Schleicher County Clerk 2 South Divide Street Eldorado, TX 76936

Selehann 965 Main Street Stone Mountain, GA 30083 Shelby County Clerk PO box 1987 Center, TX 75935

Shelby County District Clerk PO Drawer 1953 Center, TX 75935

Sherman County & District Clerk PO Box 270, Stratford, TX 79084

Starr County Clerk 401 Britton Avenue Room 201 Rio Grande City, TX 78582

Starr County District Clerk 401 N. Britton Ave Room 304 Rio Grande City, TX 78582

State Comptroller of Public Accounts Revenue Accounting Division -Bankruptcy P.O. Box 13528 Austin, TX 78711

State of Arkansas P.O. Box 8092 Little Rock, AR 72203

TD Ameritrade 2300 Litton Lane Suite 100 Hebron, KY 41048 Texas Attorney General's Office Bankruptcy-Collections Division P.O. Box 12548 Austin, TX 78711

**Texas Workforce Commission** TEC Building - Bankruptcy 101 East 15th Street Austin, TX 78778

Titus County District Clerk PO Box 492 Mount Pleasant, TX 75456

TN Dept. of Labor & Workforce Dev. 220 French Landing Drive Nashville, TN 37228

Travelers Insurance PO BOX 660317 Dallas, TX 75266

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Travis County District Clerk 1000 Guadalupe Street Austin, TX 78701 Trinity County Clerk PO Box 456 Groveton, TX 75845 United States Attorney 1100 Commerce Street 3rd Floor Dallas, TX 75242

Upton County & District Clerk PO Box 465 Rankin, TX 79778 Val Verde County District Clk. PO Box 1544 Del Rio, TX 78841 Victoria County Clerk 115 N Bridge Street Room 103 Victoria, TX 77901

Victoria County District Clerk 115 N Bridge Rm. 330 Victoria, TX 77901 Virtual CFO, Inc. 6836 Austin Center Blvd. Bldg. 1, Suite 280 Austin, TX 78731 Washington County Clerk 100 E. Main Suite 102 Brenham, TX 77833

Washington County District Clk 100 East Main Street Brenham, TX 77833

Webb County Clerk 1110 Victoria St. Suite 201 Laredo, TX 78040 Webb County District Clerk Po Box 667 Laredo, TX 78042

Wharton County Clerk 309 E. Milam Suite 200 Wharton, TX 77488 Wharton County District Clerk P.O. Drawer 391 Wharton, TX 77488 Willacy County Clerk 576 West Main Avenue Room 153 Raymondville, TX 78580

Willacy County District Clerk 576 West Main Avenue Rm. 102 Raymondville, TX 78580

Young County Clerk 516 4th Street Graham, TX 76450 Young County District Clerk 516 Fourth St. Room 201 Graham, TX 76450

Zapata County Clerk 200 E. 7th Ave. Ste 1388 Zapata, TX 78076 Zapata County District Clerk 200 E 7th Ave Suite 119 Zapata, TX 78076

Jared Knight, Cathy Mill and Bailey Hartman Morgan Williamson, LLP 701 S. Taylor, Suite 324 Amarillo, TX 79101

Stephen M. Pezanosky HAYNES AND BOONE, LLP 301 Commerce Street, Suite 2600 Fort Worth, TX 76102 Jordan E. Chavez HAYNES AND BOONE, LLP 2801 N. Harwood Street, Suite 2300 Dallas, TX 75201 Matthew T. Taplett, Esq. Pope, Hardwicke, Christie, Schell, Kelly & Taplett, L.L.P. 500 West 7th Street, Suite 600 Fort Worth, Texas 76102

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Josh Frost Field Manning Stone Aycock, PC 2112 Indiana Ave. Lubbock, TX 79410 Roger Cox Underwood P.O. Box 9158 Amarillo, TX 79105-9158 Samantha Espino Underwood P.O. Box 9158 Amarillo, TX 79105-9158

Amarillo Economic Development Corp Attn: Kevin Carter 600 S. Tyler, Suite 1600 Amarillo, TX 79101 Bexar County Clerk 100 Dolorosa St. San Antonio, TX 78205 Bexar Co. District Clerk 101 W. Nueva St., Ste 217 San Antonio, TX 78205

Brewster County Clerk 201 W. Ave. E Alpine, TX 79830 Briscoe County Clerk 415 Main St. Silverton, TX 79257 Briscoe County District Clerk 415 Main St. Silverton, TX 79257

Callahan County District Clerk 100 W. 4th St., #300 Baird, TX 79504

Crane County District Clerk P.O. Box 578 Crane, TX 79731 Donley County Clerk 220 W. 4th St. Clarendon, TX 79226

Donley County District Clerk 220 W. 4th St. Clarendon, TX 79226 Dallam County Clerk 414 Denver Ave., #201 Dalhart, TX 79022 Dallam County District Clerk 414 Denver Ave., #201 Dalhart, TX 79022

Franklin County Clerk 200 North Kaufman Street Mount Vernon, TX 75457 Goliad County Clerk 127 N. Courthouse Square Goliad, TX 77963 Goliad County District Clerk P.O. Box 50 Goliad, TX 77963

Harris County Clerk 201 Caroline St., 3rd Fl Houston, TX 77002 Hartley County Clerk 900 Main St. Channing, TX 79018 Hartley County District Clerk 900 Main St. Channing, TX 79018

Hidalgo County District Clerk 100 North Closner Boulevard Edinburg, TX 78539 Hudspeth County and District Clerk 109 Millican St. Sierra Blanca, TX 79851 King County Clerk P.O. Box 135 Guthrie, TX 79236

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King County District Clerk P.O. Box 135 Guthrie, TX 79236 Motley County and District Clerk P.O. Box 660 Matador, TX 79244 Ochiltree County Clerk 511 S. Main St., Unit \* Perryton, TX 79070

Ochiltree County District Clerk 511 S. Main St., #5 Perryton, TX 79070

Oldham County Clerk 105 S. Main St. Vega, TX 79092 Oldham County District Clerk P.O. Box 360 Vega, TX 79092

Orange County Clerk 123 S. 6th St. Orange, TX 77630 Presidio County and District Clerk P.O. Box 789 Marfa, TX 79843 Schleicher District Clerk P.O. Drawer 580 Eldorado, TX 76936

Scurry County Clerk 1806 25th St., #300 Snyder TX 79459 Swisher County and District Clerk 119 S. Maxwell Ave, #103 Tulia, TX 79088 Terrell County & District Clerk 105 E. Hackberry St. Sanderson, TX 79848

Tyler County Clerk 116 S. Charlton St. Woodville, TX 75979 Don Stecker Linebarger Goggan Blair & Sampson 112 E. Pecan Street, Suite 2200 San Antonio, TX 78205 Missouri Dept. of Labor & Indus. Relat. Division of Employment Security P.O. Box 59 Jefferson City, MO 65104-0059

Georgia Dept. of Revenue Taxpayer Services Division P.O. Box 105499 Atlanta, GA 30348-5499 Georgia Dept. of Revenue Central Collection Section 1800 Century Blvd NE, Ste. 9100 Atlanta, GA 30345-3205 Dawn Theiss Assistant U.S. Attorney 1100 Commerce Street, Third Floor Dallas, Texas 75242-1699

Nate Cramer Apryse Box 500-838 West Hastings Street Vancouver BC V6C 0A6 CANADA

Reed Clay Crestline Solutions/Crestline Group 401 W. 15<sup>th</sup> St., Suite 870 Austin, Tx. 78701 John W. Harris Law Offices of John Wallis Harris 514 Thelma Drive San Antonio, TX 78212-2455