

IN THE CIRCUIT COURT OF THE FOURTEENTH JUDICIAL CIRCUIT
IN AND FOR BAY COUNTY, FLORIDA

In re:

BOOKIT OPERATING, L.L.C.,

Assignor,

to

Case No.: 2022 CA 000130

MARK C. HEALY,

Assignee.

ASSIGNEE'S AMENDED NOTICE OF AND/OR MOTION TO LIMIT NOTICE

ALL CREDITORS AND OTHER INTERESTED PARTIES, PLEASE TAKE NOTICE THAT Mark C. Healy (the "Assignee"), by and through his undersigned attorneys, pursuant to section 727.111(6), Florida Statutes, requests that the Court either enter an order limiting the persons and entities to whom notice of certain matters must be given (the "Motion") and/or, in the event no objections to this motion are timely filed, the Assignee gives notice that he will limit notice as set forth herein below (the "Notice"). In support of his Motion and/or Notice, the Assignee states:

NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST A HEARING

PLEASE TAKE NOTICE THAT, pursuant to s. 727.111(4) and (6), Florida Statutes, the Assignee may limit notice as set forth herein and the Court may consider such action without further notice of hearing unless a party in interest files an objection within 21 days from the date this paper is served. If you object to the relief requested in this paper, you must file your objection with the Clerk of Court at 300 E. 4th Street, Panama City, Florida 32401, and serve a copy on the Assignee's attorney, Jodi Daniel Dubose, at 41 N. Jefferson Street, Suite 111, Pensacola, FL 32502, and any other appropriate person on or before Tuesday, April 12, 2022. If you file and serve an objection within the time permitted, the Court shall schedule a hearing and notify you of the scheduled hearing. If you do not file an objection within the time permitted, the Assignee and the Court will presume that you do not oppose the granting of the relief requested in this paper.

PROCEDURAL AND FACTUAL BACKGROUND

1. On February 7, 2022, this Assignment for the Benefit of Creditors under Chapter 727 of the Florida Statutes was commenced following the assignment by Bookit Operating, L.L.C. (the “**Assignor**”) to the Assignee and the Assignee’s filing of a Petition with this Court.

2. The Assignor’s assets have been assigned to the Assignee and the Assignee has been conferred certain statutory duties and powers under Chapter 727.

3. The Assignor previously provided travel, personal, and leisure services. Through such services, it became indebted to a significant number of individuals and entities, both domestic and abroad.

RELIEF REQUESTED

4. The Assignor has nearly 2,000 potential creditors and/or parties in interest.

5. The Assignee and other interested parties will have numerous matters to bring before the Court, for which notice to all potential creditors would be unduly costly and burdensome to the estate.

6. The Assignee believes that the designation of a list of creditors and interested parties which will receive limited notices in this case will result in an efficient administration of the estate and will not impair the rights of interested parties.

7. Pursuant to Fla. Stat. § 727.111(6), the Court, without notice or hearing, may limit the parties to whom notice must be given.

8. The Assignee respectfully requests that all motions and all notices required to be served pursuant to s. 727.111, Florida Statutes, be mailed only to a) the Assignor, b) the Assignor’s counsel, c) all secured creditors, d) any party named in the particular motion or notice being filed, and e) any other interested party who files a notice of appearance with the Clerk and electronically

serves the same or other written request for notice on the Assignee at notices@moecker.com. The Assignee will also post all motions and notices on the official website of these assignment proceedings at www.bookitassignment.com.

9. The relief requested herein is in the best interest of the creditors and the estate because it appears that many of the parties on the Assignor's notice list have stale claims that may be time-barred. The relief requested herein will reduce the expense of postage, copying, and mailing incurred in connection with serving notices and other papers by the Assignee.

10. This Notice and Motion, a copy of the Assignment, and a proof of claim form will be served on all creditors and parties in interest, either by mail or by direct electronic mail. In addition, notice of the case closing (at the conclusion of the case) will be sent to all creditors.

11. The relief requested herein is reasonable because a creditor need only file and serve a simple notice to ensure receipt of future notices filed by the Assignee.

12. The failure of a party in interest to timely object to the Motion and relief requested herein shall definitively authorize the Assignee to limit notice as requested herein and the same shall be deemed authorized and approved without further order of the Court.

WHEREFORE the Assignee respectfully gives notice that he will take the actions described herein above and respectfully requests that the Court (i) enter an order limiting notice as provided in s. 727.111(6), and (ii) grant such other and further relief as is just and proper in the event an objection is timely filed.

/s/ Jodi D. Dubose

Jodi D. Dubose (FBN 52651)
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