

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE: §
§
DEEPROOT CAPITAL MANAGEMENT, §
LLC, ET AL.¹, § BANKRUPTCY No. 21-51523
§
DEBTORS. § JOINTLY ADMINISTERED

TRUSTEE’S UNOPPOSED MOTION TO CONTINUE JUNE 14, 2022 HEARING ON
SILICON DRIVE OFFICE VENTURE, LLC’S
MOTION FOR PAYMENT OF ADMINISTRATIVE EXPENSES
[RELATING TO DOCKET NOS. 116, 117]

TO THE HONORABLE MICHAEL M. PARKER, UNITED STATES BANKRUPTCY JUDGE:

John Patrick Lowe, Chapter 7 Trustee herein (“Trustee”), by and through his counsel Pulman, Cappuccio & Pullen, LLP, hereby files his *Unopposed Motion to Continue June 14, 2022 Hearing on Silicon Drive Office Venture, LLC’s Motion for Payment of Administrative Expenses [Relating to Docket Nos. 115, 117]* (the “**Motion to Continue**”) requesting a continuance of the June 14, 2022 hearing on *Silicon Drive Office Venture, LLC’s Motion for Payment of Administrative Expenses* [Dkt. No. 116] (the “**Motion**”)

¹ The administratively consolidated chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” and collectively, “**Bankruptcy Estates**”. Each debtor entity is “**Debtor**” and collectively, “**Debtors**”.

PROCEDURAL BACKGROUND

1. On December 9, 2021, (the “**Petition Date**”), each of the Debtors filed their respective voluntary petition under Chapter 7 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “**Bankruptcy Code**”). Joint administration was subsequently ordered.

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

3. Pursuant to Local Rule 9013(b), a form of proposed order is attached hereto as Exhibit A.

FACTUAL BACKGROUND

4. On May 25, 2022, Silicon Drive Office Venture, LLC (“**Landlord**”) filed the Motion. The Court subsequently set the Motion for hearing on June 14, 2022.

5. Counsel for the Trustee is unavailable on June 14, 2022, due to a previously scheduled medical procedure.

6. Counsel for Landlord is unopposed to continuing the hearing on the Motion for approximately two (2) weeks.

7. Trustee requests that the Court continue the hearing on the Motion to June 28, 2022 or some other date close to June 28, 2022 that is convenient for the Court.

8. This continuance is not sought for delay but rather so that justice may be done.

WHEREFORE, Chapter 7 Trustee John Patrick Lowe respectfully requests that the Court enter an Order continuing the hearing on the Motion to June 28, 2022 or some other date convenient for the Court, and for such other or further relief that Trustee may be justly entitled.

Respectfully submitted,

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By: /s/ Randall A. Pulman
Randall A. Pulman
Texas State Bar No. 16393250

**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY
ADMINISTERED BANKRUPTCY ESTATE OF
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL.**

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of June, 2022, a true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system as follows:

Via Counsel CM/ECF:

catherine.curtis@wickphillips.com

jason.rudd@wickphillips.com

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deeproot 575 Fund, LLC
deeproot 3 Year Bonus Income Fund, LLC
deeproot BonusGrowth 5 Year Debenture Fund, LLC
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/s/Randall A. Pulman

Randall A. Pulman

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE: §
§
DEEPROOT CAPITAL MANAGEMENT, §
LLC, ET AL.¹, § BANKRUPTCY No. 21-51523
§
DEBTORS. § JOINTLY ADMINISTERED

ORDER GRANTING
TRUSTEE’S UNOPPOSED MOTION TO CONTINUE JUNE 14, 2022 HEARING ON
SILICON DRIVE OFFICE VENTURE, LLC’S
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On this day came to be heard John Patrick Lowe’s (“Trustee”) *Unopposed Motion to Continue June 14, 2022 Hearing on Silicon Drive Office Venture, LLC’s Motion for Payment of Administrative Expenses [Relating to Docket Nos. 116, 117]* (the “**Motion to Continue**”) requesting a continuance of the June 14, 2022 hearing on *Silicon Drive Office Venture, LLC’s Motion for Payment of Administrative Expenses* [Dkt. No. 116] (the “**Motion**”). After considering the pleadings and representation of counsel, this Court is of the opinion that the Motion to Continue should in all things be GRANTED.

IT IS, THEREFOERE, ORDERED that the June 14, 2022 Hearing on the Motion shall be continued to the date and time set forth hereinabove.

Trustee’s counsel shall be responsible for filing and serving notice of the continued hearing.

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Submitted by:

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