

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re)	
)	Case No. 21-99998-169
The Baker and)	
The Baker's Wife,)	Chapter 7
)	
Debtors.)	Doc. No. ____

**MOTION TO EXTEND TIME TO FILE COMPLAINT FOR
NON-DISCHARGEABILITY UNDER 11 U.S.C. §§ 523(a)(2)(A) AND 523(a)(6)**

COMES NOW Jack “The Boy” Spriggins (the “Movant”), by and through the undersigned counsel, Feephi Phoefum of Giant Law Group, LLC, and for his Motion to Extend Time to File Complaint for Non-Dischargeability Under 11 U.S.C. §§ 523(a)(2)(A) and 523(a)(6), seeking to extend the time for him to file a complaint objecting to non-dischargeability in this matter by sixty (60) days from March 7, 2022 to May 6, 2022, and states to this Court as follows:

1. The Baker (“Baker”) and the Baker’s Wife (“Baker’s Wife,” together with Baker, the “Debtors”) filed a joint voluntary petition (the “Case”) under Chapter 7 of the Bankruptcy Code, 11 U.S.C. §§ 101-1532, on December 15, 2021 (the “Petition Date”).
2. Princess Fiona serves as panel trustee in the Case.
3. The Movant, who is only a boy, is a creditor of the Debtors.
4. On October 31, 2021, the Debtors stopped the Movant while in Once Upon A Time Forest and offered to buy his prized cow, Milky White, for the sum of six (6) magic beans.
5. Upon information and belief, the Debtors deceived Movant to trade Milky White for a handful of non-magical beans.

6. Based upon the above facts, the Movant believes that grounds may exist for a determination of non-dischargeability under 11 U.S.C. §§ 523(a)(2)(A) and 523(a)(6) regarding the debt owed by the Debtors for Milky White.

7. The Movant filed a Motion for Examination Under Rule 2004 seeking to examine the Debtors under oath about their assets, liabilities, income and expenses. This Court granted that motion on February 2, 2022 [Doc. No. 26] and set the requested Rule 2004 examination for March 1, 2022, at 10:00 a.m., prevailing Central Time.

8. The Debtors advised that they were not available on March 1, 2022, because they were unable to find a babysitter and requested that Movant agree to reschedule the Rule 2004 examination. The parties now have agreed to convene that Rule 2004 examination on March 17, 2022.

9. However, the deadline to file a complaint objecting to the Debtors' discharge is March 7, 2022.

10. The Movant believes it prudent to conduct a thorough investigation of whether grounds exist to object to the Debtors' discharge before filing any such adversary proceeding.

11. The Movant accordingly believes it prudent to conduct the Rule 2004 examination prior to determining whether it is reasonable and necessary to file any adversary proceeding objecting to the Debtors' discharge.

12. Federal Rule of Bankruptcy Procedure 4007(c) permits this Court, after notice and hearing, to extend the time for filing a complaint to determine non-dischargeability for cause if a party in interest moves for that extension before the original deadline expires. See FED. R. BANKR. P. 4007(c).

13. The original deadline for filing a complaint to determine non-dischargeability has not expired as of the date and time of the filing of this Motion.

14. Cause exists for granting the relief requested because Movant wants to be sure that any adversary complaint he files is well-grounded in fact and law in order to avoid wasting everyone's time.

WHEREFORE, Jack "The Boy" Spriggins requests that this Court extend the deadline for him to file a complaint against the Debtors to determine the non-dischargeability of their debt to him to May 6, 2022, or to a date no fewer than sixty (60) days from March 7, 2022, and grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

Giant Law Group, LLC

Date: 3/3/2022

/s/Feephi Phoefum

Feephi Phoefum, Mo. Bar #12000

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Motion to Extend Time to File Complaint for Non-Dischargeability Under 11 U.S.C. §§ 523(a)(2)(A) and 523(a)(6) was filed electronically on March 3, 2022 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court’s CM/ECF System as listed on the Court’s Electronic Mail Notice List.

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I certify that a true and correct copy of the Motion to Extend Time to File Complaint for Non-Dischargeability Under 11 U.S.C. §§ 523(a)(2)(A) and 523(a)(6) was filed electronically with the United States Bankruptcy Court, and has been served by United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below on March 3, 2022.

The Baker and
The Baker’s Wife
1212 Big Shoe Bend
Once Upon A Time, MO 55555
DEBTORS

Jack “The Boy” Spriggins
777 Gingerbread Lane
Once Upon A Time, MO 55555
MOVANT

/s/ Feephi Phoefum

Feephi Phoefum