

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
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In re:

Orlando International Resort Club
Condominium Association, Inc.

Case No.: 6:25-bk-06813-GER
Chapter 11, Subchapter V

Debtor.

**UNITED STATES TRUSTEE'S
LIMITED OMNIBUS OBJECTION AND RESERVATIONS
OF RIGHTS TO DEBTOR'S EMERGENCY FIRST DAY MOTIONS**

The Acting United States Trustee for Region 21, Guy A. Van Baalen ("U.S. Trustee"), by and through his undersigned counsel files this Limited Omnibus Objection and Reservation of Rights to the following motions filed by Orlando International Resort Club Condominium Association, Inc. ("Debtor"): (i) *Emergency Motion for Interim and Final Orders (I) Authorizing the Debtor to (A) Continue to Use Existing Cash Management System, (B) Maintain Bank Accounts and Continue Use of Existing Business Forms and Checks, and (C) Honor Certain Related Prepetition and Postpetition Obligations, (II) Determining Compliance with, or Granting a Waiver of, Certain Investment and Deposit Guidelines, and (III) Granting Related Relief* (Doc. No. 3); (ii) *Expedited Motion for Entry of an Order (I) Authorizing the Debtor to Suppress Certain Personally Identifiable Information for Individual Creditors, Interval Owners, and Parties in Interest, (II) Limiting the Debtor's Noticing Obligations, and (III) Granting Related Relief* (Doc. No. 4); (iii) *Emergency Motion for Interim and Final Orders Authorizing Debtor to Pay Prepetition Sales, Use, Trust Fund, Property, and Other Taxes and Similar Obligations* (Doc. No. 6); (iv) *Declaration of Larry Baudoin in Support of*

Debtor's Chapter 11 Petitions and First Day Relief (Doc. No. 7) (“Declaration”); (v) *Emergency Application for Entry of Order Authorizing Debtor to Employ and Retain Omni Agent Solutions, Inc. as Notice, Claims, and Solicitation Agent Effective as of the Petition Date* (Doc. No. 8); (vi) *Emergency Motion for Authority to (I) Continue to Administer Insurance Policies and Related Agreements; (II) Honor Certain Obligations in Respect Thereof; and (III) for Related Relief* (Doc. No. 9); and (vii) *Expedited Motion for Entry of an Order: (A) Approving the Form and Manner of Notice of the Commencement of this Chapter 11 Case, (B) Approving Form of Stipulation and Consent Agreement Authorizing Marketing and Sale of Ownership Interest(s) by Debtor Pursuant to 11 U.S.C. § 363(h), (C) Establishing Scope of Notice, and (D) Approving Service of Forms and tabulation of Responses by Omni Agent Solutions, Inc* (Doc. No. 10) (collectively, the “First Day Motions”). In support, the U.S. Trustee states as follows:

BACKGROUND

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. The Department does not know when funding will be restored by Congress.

2. Absent an appropriation or continuing resolution, Department of Justice attorneys and employees, including the U.S. Trustee and his staff, are prohibited from working, even on a voluntary basis, except in very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

3. On October 23, 2025 (“Petition Date”), the Debtor commenced this Subchapter V Chapter 11 bankruptcy case by filing a voluntary petition (Doc. No. 1; “Petition”) in the

Middle District of Florida, Orlando Division.

4. On the Petition Date, the Debtors filed the Declaration (Doc. No. 5) along with the First Day Motions, which overwhelmingly seek the Court to consider on an emergency or expedited basis.

5. The Court has set a preliminary hearing on the First Day Motions for Wednesday, October 29, 2025, at 10:00 a.m. (the “Hearing”).

6. Prior to filing, counsel for the Debtor provided the U.S. Trustee the opportunity to review drafts of some of the First Day Motions to address any issues or concerns.

7. The U.S. Trustee remains in communication with the Debtor’s counsel and will endeavor to make every reasonable effort to address the issues he may have with the First Day Motions, however; it is unlikely the U.S. Trustee will complete his review prior to the Hearing.

8. The U.S. Trustee therefore files this Limited Omnibus Objection to preserve his rights to any and all objections to the relief sought within the First Day Motions and requests that, should the Court grant any of the First Day Motions defined herein, such relief should be granted on an interim basis and should be limited to what is absolutely necessary for the Debtor to operate without disruption and allow for the U.S. Trustee to raise any objections to the First Day Motions or amendments thereof accordingly .

Reservation of Rights

9. The U.S. Trustee therefore fully reserves all his rights with respect to the First Day Motions, including the related proposed orders, and any and all documents related thereto.

WHEREFORE, the U.S. Trustee requests that (1) should the Court grant any of the First Day Motions, that such relief should be granted on an interim basis and be limited to only

such relief that is absolutely necessary for the Debtor to operate without disruption; (2) preserve the U.S. Trustee's right to raise any and all objections he may have to the First Day Motion or any amendments thereof at future hearings; and (3) take such other action as the Court deems reasonable.

Dated: October 24, 2025.

Respectfully Submitted,

Guy A. Van Baalen,
Acting United States Trustee for Region 21

/s/ Wanda D. Murray
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing objection has been served electronically through the CM/ECF on October 24, 2025, to all parties having appeared electronically in the instant matter.

/s/ Wanda D. Murray
Wanda D. Murray, Trial Attorney