

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MY JOB MATCHER, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11280 (KBO)

(Jointly Administered)

Hearing Date: TBD

Objection Deadline: July 30, 2025 at 4:00 p.m. (ET)

**DEBTORS' MOTION FOR ENTRY OF ORDER PURSUANT TO 11 U.S.C. § 554(a)
AUTHORIZING THE ABANDONMENT OF A CERTAIN CHEVROLET EQUINOX**

The above captioned debtors and debtors-in-possession (collectively, the “Debtors”), by its undersigned counsel, hereby moves (the “Motion”) this Court for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Order”), authorizing the Debtors to abandon a certain 2020 Chevrolet Equinox VIN 3GNAXTEV6LS514445 (the “Vehicle”) pursuant to 11 U.S.C. § 554(a). In support thereof, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. The Debtors confirm their consent, pursuant to rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: My Job Matcher, Inc. (9880); Job.com-HV, Inc. (DE) (5873); Job.com-HV, Inc. (FL) (5873); Job.com-Fortus, Inc. (6145); Job.com-Endevis, Inc. (1956); Job.com-QCI, Inc. (4364); Princeton One-Job.com, Inc. (4752); and Princeton Search L.L.C. (6163). For purposes of these chapter 11 cases, the Debtors’ service address is 1743 Sidewinder Drive, 1st Floor, Park City, Utah 84060.

District of Delaware (the “Local Rules”), to the entry of a final order by the Court in connection with this motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are section 554(a) of the Bankruptcy Code, and Rule 6007(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

BACKGROUND

I. General Background

4. On July 6, 2025 (the “Petition Date”), the Debtors filed their respective voluntary petitions for relief under Chapter 11 of title 11 of the United States Code, commencing these Chapter 11 cases (the “Chapter 11 Cases”).

5. The Debtors continue in the possession of their property and has continued to operate and manage its business as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. Additional factual background regarding the Debtors, including their business operations, capital and debt structures and the events leading to the filing of these Chapter 11 Cases is set forth in the *Declaration of Robert J. Corliss in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 13] (the “First Day Declaration”),² which is fully incorporated herein by reference.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the First Day Declaration as applicable.

II. Vehicle To Be Abandoned

7. As part of their ordinary course operations, the Debtors have historically owned and leased various assets that were necessary for their businesses, helped them manage their operations effectively, and allowed them to support their employees. Among these assets is a certain used 2020 Chevrolet Equinox that was purchased by Debtor Job.com-QCI, Inc. in August 2022. It is the Debtors understanding that as of the Petition Date, the Vehicle is located in Grand Rapids, Michigan and in the possession of a former employee.

8. The Debtors seek to abandon the Vehicle as it is of inconsequential value and the cost of removing and storing the Vehicle for future use, marketing, or sale exceeds its value to the Debtors' estates. Accordingly, to reduce postpetition administrative costs and in the exercise of the Debtors' sound business judgment, the Debtors believe that the abandonment of the Vehicle is appropriate and in the best interests of the Debtors, their estates, and their creditors.

9. Moreover, the Debtors have communicated their intentions to abandon their interest in the vehicle to the co-borrower, and the current lienholder, GM Financial.

RELIEF REQUESTED

10. By this Motion, the Debtors seek entry of an order, pursuant to 11 U.S.C. § 554(a), (i) authorizing the abandonment of the Vehicle, and (ii) granting related relief.

BASIS FOR RELIEF

11. Under section 554(a) of the Bankruptcy Code, "[a]fter notice and a hearing, the trustee may abandon any property of the estate that is burdensome to the estate or that is of inconsequential value and benefit to the estate." 11 U.S.C. § 554(a). With certain limited exceptions, a debtor-in-possession has "all the rights . . . and powers . . . of a trustee serving in a case under this chapter," 11 U.S.C. § 1107(a), including the trustee's prerogative to abandon

property of the estate. Furthermore, “[a]bandonment’ requires affirmative action or some other evidence of intent by the trustee.” *Stein v. United Artists Corp.*, 691 F.2d 885, 890 (9th Cir. 1982) (citations omitted).

12. The power to abandon property of the estate is discretionary, and a “trustee [or debtor-in-possession] is afforded wide discretion in determining whether to abandon an estate asset.” *In re Kneer*, 628 B.R. 205, 215 (Bankr. E.D. Pa. 2021) (quoting *In re Wilton Armetale, Inc.*, 618 B.R. 424, 433 (Bankr. E.D. Pa. 2020). Courts “will generally defer to the [t]rustee’s [or debtor-in-possession’s] judgment in determining whether to abandon a property.” *In re Syntax-Brilliant Corp.*, 2018 WL 3491758, at *15 (Bankr. D. Del. July 18, 2018) (quoting and following *In re Moore*, No. 15-10174, 2015 WL 5674430, *9 (Bankr. D.N.J. Sept. 25, 2015). Specifically, for such a decision to pass muster under section 554(a), a court need only find that the debtor-in-possession made (i) a business judgment, (ii) in good faith, (iii) upon some reasonable basis, and that (iv) such business judgement was within the debtor’s scope of authority. *In re APP Winddown, LLC*, No. 16-12551 (BLS), 2019 Bankr. LEXIS 3790, at *10 (Bankr. D. Del. Dec. 16, 2019); *Syntax-Brilliant Corp.*, 2018 WL 3491758, at *15 (citing to, and using the test articulated in, *In re Slack*, 290 B.R. 282, 284 (Bankr. D.N.J. 2003), *aff’d*, 112 F. App’x 868 (3d Cir. 2004)).

13. Courts generally give a debtor in possession great deference to its decision to abandon property. *See, e.g., In re Vel Rey Props., Inc.*, 174 B.R. 859, 867 (Bankr. D.D.C. 1994) (“Clearly, the court should give deference to the trustee’s judgment in such matters.”). Unless certain property is harmful to the public, once a debtor has shown that it is burdensome or of inconsequential value to the estate, a court should approve the abandonment. *Id.*

14. The Debtors have determined, in their good faith business judgment, that the Vehicle serves no benefit and adds no value to the administration of the estates. Additionally, the

Debtors have no use for the Vehicle. An expeditious abandonment of the Vehicle will relieve the Debtors of any administrative burden associated with the Vehicle.

WAIVER OF BANKRUPTCY RULE 6007

15. Among other things, Bankruptcy Rule 6007(a) requires that the Debtors serve a copy of this Motion, “[u]nless otherwise directed by the court” on “all creditors.” Fed. R. Bank. Pro. 6007(a). The Debtors’ creditor matrix contains over 1,500 parties. Accordingly, serving the Motion upon all such parties would be unnecessarily burdensome and costly. The Debtors will serve a copy of this Motion on the parties in interest set forth below and, therefore, request, to the extent required, a limited waiver of the service requirement set forth in Rule 6007. The Debtors submit that the requested waiver is appropriate and will properly and timely effectuate notice to the real parties in interest.

NOTICE

16. A true and correct copy of this Motion, as well as the Notice filed concurrently therewith, will be given to: (i) the United States Trustee for the District of Delaware; (ii) the co-borrower, (iii) GM Financial; (iv) counsel for the Lenders, (v) counsel to the Official Committee of unsecured Creditors; and (iii) persons who have requested notice pursuant to Bankruptcy Rule 2002. The Debtors submits that, in light of the nature of the relief requested, no other or further notice need be given.

[Remainder of Page Intentionally Left Blank]

CONCLUSION

WHEREFORE, the Debtors respectfully request entry of the Order, substantially in the form attached hereto as **Exhibit A**, (a) granting the relief requested herein, and (b) granting such other relief as the Court deems appropriate under the circumstances.

Dated: July 16, 2025
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Christopher M. Donnelly

Carl N. Kunz, III (DE Bar No. 3201)

Jeffrey R. Waxman (DE Bar No. 4159)

Christopher M. Donnelly (DE Bar No. 7149)

Samantha L. Rodriguez (DE Bar No. 7524)

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

E-mail: ckunz@morrisjames.com

jwaxman@morrisjames.com

cdonnelly@morrisjames.com

srodriguez@morrisjames.com

Proposed Counsel for Debtors and Debtors-in-Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MY JOB MATCHER, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11280 (KBO)

(Jointly Administered)

Hearing Date: TBD

Objection Deadline: July 30, 2025 at 4:00 p.m. (ET)

**NOTICE OF DEBTORS' MOTION FOR ENTRY OF
ORDER PURSUANT TO 11 U.S.C. § 554(a) AUTHORIZING THE
ABANDONMENT OF A CERTAIN CHEVROLET EQUINOX**

PLEASE TAKE NOTICE that on July 16, 2025, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtors' Motion for Entry of Order Pursuant to 11 U.S.C. § 554(a) Authorizing the Abandonment of a Certain Chevrolet Equinox* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the Motion or the relief requested therein must be filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 **on or before July 30, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must serve a copy of the objection so as to be received on or before the Objection Deadline upon the undersigned proposed counsel to the Debtors.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held **on a date to be determined and noticed**, if any objections are received, (the “Hearing”) before the Honorable Karen B. Owens, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th floor, Courtroom No. 3, Wilmington, Delaware 19801.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: My Job Matcher, Inc. (9880); Job.com-HV, Inc. (DE) (5873); Job.com-HV, Inc. (FL) (5873); Job.com-Fortus, Inc. (6145); Job.com-Endevis, Inc. (1956); Job.com-QCI, Inc. (4364); Princeton One-Job.com, Inc. (4752); and Princeton Search L.L.C. (6163). For purposes of these chapter 11 cases, the Debtors’ service address is 1743 Sidewinder Drive, 1st Floor, Park City, Utah 84060.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS OR RESPONSES TO THE MOTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 16, 2025
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Christopher M. Donnelly

Carl N. Kunz, III (DE Bar No. 3201)
Jeffrey R. Waxman (DE Bar No. 4159)
Christopher M. Donnelly (DE Bar No. 7149)
Samantha L. Rodriguez (DE Bar No. 7524)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: ckunz@morrisjames.com
jwaxman@morrisjames.com
cdonnelly@morrisjames.com
srodriguez@morrisjames.com

Proposed Counsel for Debtors and Debtors-in-Possession

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MY JOB MATCHER, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-11280 (KBO)

(Jointly Administered)

Re: Docket No. ____

**ORDER AUTHORIZING THE DEBTORS’
ABANDONMENT OF A CERTAIN CHEVROLET EQUINOX**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”) (a) authorizing the Debtors to abandon a certain 2020 Chevrolet Equinox VIN 3GNAXTEV6LS514445 (the “Vehicle”) and (b) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and the district court having jurisdiction under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: My Job Matcher, Inc. (9880); Job.com-HV, Inc. (DE) (5873); Job.com-HV, Inc. (FL) (5873); Job.com-Fortus, Inc. (6145); Job.com-Endevis, Inc. (1956); Job.com-QCI, Inc. (4364); Princeton One-Job.com, Inc. (4752); and Princeton Search L.L.C. (6163). For purposes of these chapter 11 cases, the Debtors’ service address is 1743 Sidewinder Drive, 1st Floor, Park City, Utah 84060.

² Capitalized terms used but not otherwise defined in this Order have the meanings given in the Motion.

interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDER THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to section 554(a) of the Bankruptcy Code, the Debtors are authorized to abandon the Vehicle, and the Vehicle is hereby deemed abandoned by the Debtors.
3. The Debtors are authorized to take all such actions necessary or appropriate to effectuate the relief granted pursuant to this Order.
4. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.
5. The requirements of Rule 6007(a) of the Federal Rules of Bankruptcy Procedure that the Motion be served upon "all creditors" is hereby waived, and service upon the parties described in the Motion is found to be sufficient for the purposes of the relief requested in the Motion.
6. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

7. This Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.