

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

In re:

Parlement Technologies, Inc.,  
(f/k/a Parler LLC, f/k/a Parler Inc.),

Debtor.

Chapter 11

Case No. 24-10755 (CTG)

Hearing Date: May 29, 2024 at 3:00 p.m.

Objection Deadline: May 17, 2024 at 4:00 p.m.

**DEBTOR’S MOTION FOR EXTENSION OF TIME  
TO FILE LISTS, SCHEDULES, AND STATEMENTS**

The above-captioned debtor (the “Debtor”), by and through its proposed undersigned counsel, respectfully moves this Court to enter an Order extending the Debtor’s deadlines to file the Lists, Schedules, and Statements pursuant to 11 U.S.C. § 521(a) and Fed. R. Bankr. P. 1007(c) (the “Motion”), and respectfully state as follows:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue lies properly in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157.

**BACKGROUND**

2. On April 15, 2024, (the “Petition Date”), the Debtor filed with this Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

3. Pursuant to 11 U.S.C. § 521(a) and Fed. R. Bankr. P. 1007(c), the Schedules A-H, Declaration Concerning Schedules, Summary of Schedules, Disclosure of Compensation of Attorney, Corporate Ownership Statement, Statement of Financial Affairs (collectively, the “Schedules”), are due on April 29, 2024.

4. The Debtor is in the process of compiling the information necessary to complete the Schedules and counsel is still in the process of preparing the necessary documents. As such, the Debtor requests an additional thirty (30) days to complete the Schedules.

**RELIEF REQUESTED**

5. The Debtor seeks entry of an order extending for an additional thirty (30) days to file the Schedules pursuant to 11 U.S.C. § 521(a) and Fed. R. Bankr. P. 1007(c).

**THE BASIS FOR RELIEF AND THE REASONS THEREFOR**

6. Federal Rule of Bankruptcy Procedure 1007(c) allows for the extension of time to file the Schedules for cause shown. *See* Fed. R. Bankr. P. 1007(c).

7. The Debtor believes that cause exists to allow the extension of time. The Debtor and its counsel are working diligently to prepare their Schedules for the Debtor's bankruptcy case. An additional thirty (30) day extension will allow the Debtor and its counsel time to marshal the requisite information and will provide the time needed to complete the Schedules.

8. The Debtor believes that the delay will not cause any prejudice to any creditor or other interested party by permitting the Debtor an extension of thirty (30) days, from April 29, 2024 until May 29, 2024, to prepare and file its Schedules.

**NOTICE**

9. Notice of this Motion has been provided to the following parties, or, in lieu thereof, to their counsel, if known: (a) the Office of the United States Trustee for the District of Delaware; (b) the Debtor's top twenty (20) largest unsecured creditors as set forth in the list filed with the Court; and (c) any persons who have filed a request for notice pursuant to Bankruptcy Rule 2002 and such other government agencies to the extent required by the applicable rules. The Debtor submits that no other or further notice need be provided.

**NO PRIOR REQUEST**

10. No prior motion for the relief requested herein has been made to this or any other court.

**WHEREFORE**, the Debtor respectfully requests that this Court enter an Order granting an extension of time until May 29, 2024 for the Debtor to file its Schedules A-H, Declaration Concerning Schedules, Summary of Schedules, Disclosure of Compensation of Attorney, Corporate Ownership Statement, and Statement of Financial Affairs.

Dated: April 29, 2024  
Wilmington, Delaware

**BIELLI & KLAUDER, LLC**

*/s/ David M. Klauder*  
\_\_\_\_\_  
David M. Klauder (No. 5769)  
1204 N. King Street  
Wilmington, DE 19801  
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*Proposed Counsel to the Debtor*

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

In re:

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Debtor.

Chapter 11

Case No. 24-10755 (CTG)

**Re: Docket No. \_\_\_\_\_**

**ORDER EXTENDING TIME TO FILE LISTS, SCHEDULES, AND STATEMENTS**

Upon consideration of the motion (the “Motion”) of the above-captioned debtor (the “Debtor”) for an extension of time to file Schedules A-H, Declaration Concerning Schedules, Summary of Schedules, Disclosure of Compensation of Attorney, Corporate Ownership Statement, and Statement of Financial Affairs (collectively, “Schedules”), and there being good cause for granting relief requested in the Motion, IT IS HEREBY:

ORDERED, that the Motion is GRANTED as set forth herein;

ORDERED, that the above-captioned Debtor shall have until May 29, 2024 to file the Schedules in the Debtor’s case;

ORDERED, that the Court shall retain jurisdiction to implement the terms of this Order.

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

In re:

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Chapter 11

Case No. 24-10755 (CTG)

**Hearing Date: May 29, 2024 at 3:00 p.m. (ET)**

**Objection Deadline: May 17, 2024 at 4:00 p.m. (ET)**

**NOTICE OF DEBTOR'S MOTION FOR EXTENSION OF TIME  
TO FILE LISTS, SCHEDULES, AND STATEMENTS**

**PLEASE TAKE NOTICE** that on April 29, 2024, the above-captioned debtor (the "Debtor"), by and through its proposed undersigned counsel, filed the Debtor's Motion for Extension of Time to File Lists, Schedules, and Statements (the "Motion"), seeking to allow the Court to enter an Order granting an extension of time until May 29, 2024.

Any responses to the Motion must be filed in writing with the Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon and received by the undersigned counsel for the Debtor on or before **May 17, 2024 at 4:00 p.m. (ET)**.

If a response is timely filed and served and such response is not otherwise resolved, a hearing to consider such response and the Motion will be held before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 3rd Floor, Courtroom 7, 824 Market Street, Wilmington, Delaware 19801 on **May 29, 2024 at 3:00 p.m. (ET)**.

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

Dated: April 29, 2024  
Wilmington, Delaware

**BIELLI & KLAUDER, LLC**

*/s/ David M. Klauder*

David M. Klauder (No. 5769)

1204 N. King Street

Wilmington, DE 19801

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*Proposed Counsel to the Debtor*

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**CERTIFICATE OF SERVICE**

I, David M. Klauder, certify that on April 29, 2024, I caused a true and correct copy of the foregoing *Debtor's Motion for Extension of Time to File Lists, Schedules, and Statements* to be filed and served via electronic mail or First Class U.S. Mail to the parties set forth on the attached service list.

Dated: April 29, 2024  
Wilmington, Delaware

**BIELLI & KLAUDER, LLC**

/s/ David M. Klauder

David M. Klauder (No. 5769)

1204 N. King Street

Wilmington, DE 19801

Phone: (302) 803-4600

Email: [dklauder@bk-legal.com](mailto:dklauder@bk-legal.com)

*Proposed Counsel to the Debtor*

**SERVICE LIST**

**Top 20 Creditors**

ALPHASTAFF INC  
1300 Sawgrass  
Corporate Parkway  
SUITE 220  
SUNRISE, FL 33323

AWS  
410 Terry Ave North  
Seattle, WA 98109

Bailey Blunt  
7600 Cabot Dr Apt# 1115  
Nashville, TN 37209

CARLSBERG DATA CENTER  
1880 CENTURY PARK EAST, STE 1410  
Los Angeles, CA 90067

Cherry Bekaert LLP  
Attn: Accounts Receivable  
P.O. Box 25549  
Richmond, VA 23260-5500

Clark County Assessor  
500 S. Grand Central Pkwy.  
Las Vegas, NV 89155

E78 Partners, LLC  
1301 W. 22nd St, Suite 410  
Oak Brook, IL 60523

Ink Ventures LLC  
2222 12th Ave S, Suite 300  
Nashville, TN 37215

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**United States Trustee**

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