### UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF COLUMBIA

In Re:

CASE NO. 05-00720 (SMT)

# UWE SIEMON-NETTO and GILLIAN SIEMON-NETTO

CHAPTER 7

Debtors.

## CREDITOR THE SOCIETY OF LLOYD'S MOTION TO EXTEND TIME TO OBJECT TO EXEMPTIONS

The Society of Lloyd's ("Lloyd's" or "Creditor"), pursuant to Fed. R. Bankr. P. 9006(b), respectfully moves the Court to extend the deadline for objecting to Debtors' exemptions to September 30, 2005. In support of this Motion, Lloyd's states as follows:

1. On May 9, 2005, Debtors filed their Petition for Relief in this case. Lloyd's is the primary and by far the largest unsecured creditor of Debtors.

2. The current deadline for objecting to exemptions is July 18th. The Debtors own property in Europe, a portion of which they have claimed as exempt.

3. The Trustee filed a Consent Motion seeking an extension until September 30, 2005 as his deadline for objecting to Debtors' Exemptions on grounds that the Debtors have property in storage and in France and the Trustee will need several months to evaluate the exemptions claimed by Debtors. This Court granted the Trustee's motion for extension by order dated July 6, 2005.

4. Accordingly, good cause exists to also extend the time for Creditor to object to Debtors' claimed exemptions until September 30, 2005, the current deadline for the Trustee.

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5. Counsel for Lloyd's has attempted to contact counsel for Debtor to seek his consent to this motion but was unable to reach him and left a message on his answering machine.

Wherefore, Lloyd's moves for entry of an Order extending the time in which it may object to Debtors' claimed exemptions, and requests that the proposed Order granting the Motion and submitted herewith be entered.

Dated: July 15, 2005

Respectfully submitted,

<u>/s/ Stephen J. Jorden</u> Stephen J. Jorden (D.C. Bar No. 441138) **JORDEN BURT LLP** Jefferson Court, Suite 400 East 1025 Thomas Jefferson Street, N.W. Washington, D.C. 20007 Telephone: (202) 965-8100 Facsimile: (202) 975-8104

### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Motion to Extend Time to file Objections to Debtors' Exemptions was served via U.S. mail on this 15<sup>th</sup> day of July 2005 to: Uwe Siemon-Netto and Gillian Siemon-Netto, 1444 Rhode Island Avenue, NW, Apartment 317, Washington, DC 20005; Brett Weiss, Esq., counsel for debtor, Brett Weiss, P.C., 18200 Littlebrooke Drive, Olney, MD 20832; Kevin R. McCarthy, Esq., Trustee, McCarthy & White, PLLC, 8180 Greensboro Drive, Suite 875, McLean, VA 22102; and U.S. Trustee, Region Four, 115 South Union Street, Plaza Level, Suite 210, Alexandria, VA 22314.

> <u>/s/Stephen J. Jorden</u> Stephen J. Jorden (D.C. Bar No. 441138) **JORDEN BURT LLP** Attorneys for The Society of Lloyd's 1025 Thomas Jefferson Street, N.W. Suite 400 East Washington, DC 20007-5208 Telephone: 202-965-8100 Facsimile: 202-965-8104

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