

1 ILENE J. LASHINSKY (AZ #3073)  
United States Trustee  
2 District of Arizona

3 JENNIFER A. GLAIMO (NY #2520005)  
Trial Attorney  
4 [REDACTED]  
Phoenix, Arizona 85003-1706  
5 [REDACTED]  
6 [REDACTED]

7 IN THE UNITED STATES BANKRUPTCY COURT  
8 FOR THE DISTRICT OF ARIZONA

9 In re: ) Chapter 7  
)  
10 LAURA OWENS, ) Case No. 2:25-bk-11801-BKM  
)  
11 Debtor. ) **UNITED STATES TRUSTEE’S**  
) **UNOPPOSED MOTION TO EXTEND**  
12 ) **DEADLINE FOR FILING SECTION**  
) **727 OBJECTION TO DISCHARGE**

13  
14 The United States Trustee (“UST”), by and through the undersigned counsel, files  
15 this Unopposed Motion to Extend Deadline for Filing Section 727 Objection to Discharge  
16 and respectfully shows the following:

17 **MEMORANDUM OF POINTS AND AUTHORITIES**

18 Debtor, Laura Owens ("Debtor"), filed her voluntary Chapter 7 bankruptcy  
19 petition in this case on December 8, 2025. *See Docket #1*. The current deadline for  
20 parties to file a complaint objecting to Debtor’s discharge under 11 U.S.C. § 727 is  
21 March 13, 2026, which is sixty (60) days from the first date set for the meeting of  
22 creditors pursuant to 11 U.S.C. § 341(a). *See* FED. R. BANKR. P. 4004(a)(1). This  
23 request to extend that deadline is being filed before the expiration of the current deadline.

1 On February 12, 2026, the Court granted the UST's request to obtain documents  
2 from and examine the Debtor pursuant to Fed. R. Bankr. P. 2004. *See Docket #36*. The  
3 UST has conferred with Debtor about a convenient date for Debtor to appear for  
4 examination, and the UST has agreed to accommodate Debtor's schedule by scheduling  
5 the examination in April. In light of the fact that Debtor's Rule 2004 examination will be  
6 occurring after the current deadline for the UST to file a complaint objecting to discharge  
7 under 11 U.S.C. § 727, the UST requests that the Court extend that deadline by seventy-  
8 five (75) days from March 13, 2026 until May 27, 2026.

9 Counsel for the UST conferred with Debtor regarding this requested extension  
10 and Debtor stated that she was agreeable to the UST's request to extend the deadline to  
11 file a complaint under 11 U.S.C. § 727.<sup>1</sup>

12 Pursuant to Fed. R. Bankr. P. 4004(b)(1), the Court may extend the deadline for a  
13 party to file a complaint objecting to a debtor's discharge upon a showing of cause. *See*  
14 FED. R. BANKR. P. 4004(b)(1). Cause exists for an extension in this case based on the  
15 Debtor's request that her Rule 2004 examination be conducted in April, after the current  
16 11 U.S.C. § 727 complaint deadline.

17 WHEREFORE the UST respectfully requests that the Court grant this unopposed  
18 motion and issue the proposed order being lodged herewith and extend the deadline for  
19 the UST to file a complaint objecting to the Debtor's deadline pursuant to 11 U.S.C. §  
20 727 until May 27, 2026.  
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22  
23 <sup>1</sup> Debtor was agreeable to an extension for sixty (60) days from the date of her examination. This requested extension is for a shorter period than what Debtor agreed to.

1 RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of February, 2026.

2 ILENE J. LASHINSKY  
3 United States Trustee  
4 District of Arizona

5 /s/ JAG (NY #2520005)

6 \_\_\_\_\_  
7 JENNIFER A. GIAIMO  
8 Trial Attorney

9 **CERTIFICATE OF SERVICE**

10 This is to certify that on February 23, 2026, a copy of the foregoing pleading was  
11 served on the Debtor via first class mail at the addresses listed below:

12 Laura Owens  
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12 /s/ Jennifer A. Giaimo

13 \_\_\_\_\_  
14 JENNIFER A. GIAIMO