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*Attorneys for Automotive Rentals, Inc. and
ARI Fleet LT*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH**

In re:

EMPIRE SOLAR GROUP, LLC,

Debtor.

Bankruptcy No. 21-23636 (JTM)

Chapter 7

**NOTICE OF MOTION TO APPROVE STIPULATION BETWEEN THE CHAPTER 7
TRUSTEE AND AUTOMOTIVE RENTALS, INC., AND ARI FLEET LT FOR (1)
REJECTION OF CERTAIN LEASE AGREEMENTS; AND (2) RELIEF FROM, AND
ANNULMENT OF, THE AUTOMATIC STAY AS IT RELATES TO CERTAIN
VEHICLES AND NOTICE OF OPPORTUNITY FOR HEARING**

Objection Deadline: October 15, 2021
Reserved Hearing Date: October 20, 2021 at 10:30 am (Mountain Time)

PLEASE TAKE NOTICE that Automotive Rentals, Inc., a New Jersey corporation, on its own behalf, and ARI Fleet LT, a Delaware business trust, appearing herein through its servicer Automotive Rentals, Inc. (collectively, “**ARI**”), a creditor in the above-reference bankruptcy case, has filed with the United States Bankruptcy Court for the District of Utah (the “**Court**”) a *Motion to Approve Stipulation Between the Chapter 7 Trustee and Automotive Rentals, Inc., and ARI Fleet LT for (1) Rejection of Certain Lease Agreements; and (2) Relief From, and Annulment Of, the Automatic Stay as it Relates to Certain Vehicles* (the “**Motion**”).

A copy of the Motion was served electronically via the Court's CM/ECF system on the Office of the United States Trustee and on all parties who receive electronic notice in this case. If you have not received a copy of the Motion and you would like one, you may obtain a copy by requesting it from ARI's undersigned counsel.

PLEASE TAKE FURTHER NOTICE that pursuant to the Motion, the ARI is seeking Court approval of a Stipulation (the "Stipulation") between ARI and Steven R. Bailey, Chapter 7 Trustee of the above-referenced case (the "Trustee") stipulating to relief from the automatic stay as it relates to certain leased Vehicles, and rejection of that certain Lease Agreement related to the Vehicles. A copy of the Stipulation is attached to the Motion as **Exhibit 1** and can be requested from ARI's undersigned counsel.

YOUR RIGHTS MAY BE AFFECTED. You should carefully read this Notice, as well as the Motion, and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

NO HEARING WILL BE CONDUCTED ON THE MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then you or your attorney must:

(1) On or before **October 15, 2021**, file a written objection specifically stating the nature of your objection at:

Clerk of the United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing, you must mail it early enough so that the Court will actually receive it on or before October 15, 2021. You must also

mail a copy to the undersigned counsel at 111 South Main Street, 21st Floor, Salt Lake City, Utah 84111.

(2) You must also attend the hearing on the Motion on **October 20, 2021 at 10:30 am (Mountain Time)** before the Honorable Joel T. Marker, United States Bankruptcy Judge, via telephonic hearing, accessible via the following dial in number: (636) 651-3182, Access Code # 3834658. **There will be no further notice of the hearing**, and failure to attend the hearing will be deemed a waiver of your objection.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting the relief requested in the Motion. Additionally, pursuant to the Court's Local Rules, absent timely filing and service of responses and objections to the Motion, undersigned counsel may and will ask the Court to enter an Order approving the Motion without a hearing

DATED this 24th day of September, 2021.

DORSEY & WHITNEY LLP

/s/ Megan K. Baker

Steven T. Waterman

Megan K. Baker

*Attorneys for Automotive Rentals, Inc. and ARI
Fleet, LT*

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2021, I electronically filed the foregoing **NOTICE OF MOTION TO APPROVE STIPULATION BETWEEN THE CHAPTER 7 TRUSTEE AND AUTOMOTIVE RENTALS, INC., AND ARI FLEET LT FOR (1) REJECTION OF CERTAIN LEASE AGREEMENTS; AND (2) RELIEF FROM, AND ANNULMENT OF, THE AUTOMATIC STAY AS IT RELATES TO CERTAIN VEHICLES AND NOTICE OF OPPORTUNITY FOR HEARING** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF uses and will be served through the CM/ECF system.

- **Steven R. Bailey tr** karen@baileylaw.org, UT06@ecfcbis.com
- **Megan K Baker** baker.megan@dorsey.com, long.candy@dorsey.com
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- **Mark S. Swan** mswan@strongandhanni.com, mark@swanlaw.net
- **United States Trustee** USTPRegion19.SK.ECF@usdoj.gov

I further certify that I caused to be served a true and correct copy of the foregoing via first class U.S. Mail on the following parties:

Empire Solar Group, LLC
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/s/ Megan K. Baker