

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: JOHN COLEMAN
Debtor

CHAPTER 11
CASE NO. 21-11833-SDM

MOTION TO CONVERT CHAPTER 11 CASE TO A CASE UNDER CHAPTER 7

COMES NOW John Coleman (the “Debtor”), and files this his *Motion to Convert Chapter 11 Case to a Case Under Chapter 7* (the “Motion”), and in support thereof, would respectfully show unto this Honorable Court as follows, to-wit:

1. On September 29, 2021 the Debtor herein filed with this Court his Voluntary Petition for bankruptcy under Chapter 11 of the Bankruptcy Code (the “Petition”).
2. Subsequent thereto, the Debtor has maintained this case in Chapter 11, although he filed a Motion to Dismiss Case [DK #66] for the reasons stated in that motion.
3. The Court declined to grant the Motion to Dismiss and directed the United States Trustee (the “UST”) to appoint an examiner in an Order [DK #94] entered January 12, 2022.
4. Debtor understands that the UST has selected an examiner.
5. At this stage of this Chapter 11 case, it does not appear that the Debtor will be able to file or submit a confirmable plan of reorganization, the Debtor has no source of income and Express Grain Terminals, LLC, the company that has employed Debtor and paid his salary for many years, is about to be liquidated and its assets sold.
6. Accordingly, no reason exists for the Debtor to continue this Chapter 11 case and, since the Debtor does not believe that a second motion to dismiss would be granted, he elects to exercise his right to convert to a case under Chapter 7.
7. Other grounds to be shown upon a hearing hereof if necessary.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its order granting the Motion and converting this case to a case under Chapter 7 of the Bankruptcy Code. Debtor prays for general relief.

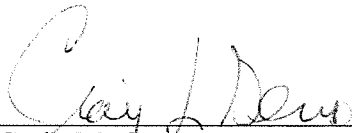
THIS, the 12 day of February, 2022.

Respectfully submitted,

JOHN COLEMAN

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

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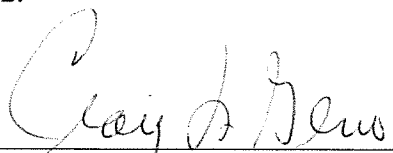
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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Abigail M. Marbury, Esq.
abigail.m.marbury@usdoj.gov

THIS, the 12 day of February, 2022.


Craig M. Geno