

# Exhibit G

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
	)	
TRUSTEES OF CONNEAUT LAKE	)	Bankruptcy Case No. 14-11277-JAD
PARK, INC.,	)	
	)	Chapter 11
Reorganized Debtor.	)	
_____	)	
	)	
TRUSTEES OF CONNEAUT LAKE	)	
PARK, INC.,	)	Document No. _____
	)	
Movant,	)	
v.	)	<u>Hearing Date &amp; Time:</u>
	)	June 25, 2021 at 11:00 a.m. VIA ZOOM
NO RESPONDENT,	)	
	)	<u>Response Deadline:</u>
Respondent.	)	June 18, 2021

**REPORT AND APPLICATION FOR FINAL DECREE**

AND NOW, comes Trustees of Conneaut Lake Park, Inc. (the "Debtor"), by and through its undersigned counsel, and hereby files the within Report and Application for Final Decree, and in support thereof states:

**BACKGROUND**

1. On December 4, 2014 (the "Petition Date"), the Debtor caused the filing of a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").

2. The Debtor has continued in the management and operation of its affairs and in the management and operation of its property as debtor-in-possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code through March 8, 2021. No trustee, examiner, or committee of creditors has been appointed in this case.

3. On September 6, 2016, TCLP's Joint Plan of Reorganization Dated July 28, 2016 (the "Plan") was confirmed by Order of Court entered at Document No. 442 (the "Confirmation Order").

4. On March 2, 2021, the Court entered its *Order (A) Authorizing the Sale of Substantially All of the Debtor's Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests; and (B) Granting Related Relief* (the "All Asset Sale Order"). See Document No. 672.

5. Prior to entry of the All Asset Sale Order and up through March of 2020, the Debtor performed as required under the Plan including satisfying the Secured Tax Claims, making quarterly distributions to holders of Secured Non-Tax Claims, and liquidating Non-Core Parcels for sale and distributing payments in accordance with the lien priorities under applicable non-bankruptcy law.

6. The Debtor and the Successful Bidder, as defined in the All Asset Sale Order, closed on the sale of the Debtor's property on March 8, 2021. The Closing Costs<sup>1</sup> for the Sale were paid on or around March 8, 2021, while the Net Sale Proceeds remained in escrow with Debtor's counsel pending further Order of Court.

7. On April 6, 2021, the Debtor filed its Consent Motion for Distribution of Sale Proceeds (the "Distribution Motion") pursuant to which it sought authority to distribute the Net Sale Proceeds in accordance with the terms stated therein.

8. On April 30, 2021, the Court granted the Distribution Motion and entered that certain Order of Court (the "Distribution Order") pursuant to which the Court authorized Debtor's counsel to distribute the Net Sale Proceeds in accordance with the terms of the Distribution Order.

---

<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning given to them in the All Asset Sale Order.

9. Upon the Distribution Order becoming a final, non-appealable Order, Debtor's counsel made the distributions to the parties and in the amounts identified in the Distribution Order.

10. As of the filing of this Motion, there is nothing left in the Debtor's estate to be administered. Additionally, all litigation involving the Debtor previously pending before the Court has been finally resolved.

**APPLICATION FOR FINAL DECREE**

11. Section 350(a) of the Bankruptcy Code provides in relevant part: "After an estate is fully administered . . . the court shall close the case." 11 U.S.C. § 350(a).

12. Bankruptcy Rule 3022 provides: "After an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case." Fed. R. Bankr. P. 3022.

13. As the Confirmation Order is final and all payments that can be made to the creditors are completed, the Debtor believes that its estate is fully administered as contemplated by section 350(a) of the Bankruptcy Code and Rule 3022 of the Federal Rules of Bankruptcy Procedure.

14. All of the required payments to the Office of the United States Trustee made to date have been made on a timely basis, and it is anticipated that the fee due and owing for the quarter ending June 30, 2021 will also be timely made. There are no outstanding charges to the Bankruptcy Clerk as indicated in the Certificate of Costs at Docket No. 692.

15. There are currently no open matters before this Court involving the Debtor.

16. The Debtor believes that it is appropriate to close its Bankruptcy case at this time and for the Court to retain jurisdiction as contemplated in Article 11.01 of the Plan.

17. A Report for Bankruptcy Judges in cases to be closed is attached as Exhibit "A."

**WHEREFORE**, the Debtor respectfully requests that this Court enter an Order granting a final decree in this case, with the reservation of jurisdiction noted above, and such other relief as the Court deems just and proper.

**STONECIPHER LAW FIRM**

Dated: June 1, 2021

/s/ Jeanne S. Lofgren

George T. Snyder, Esq.

P.A. I.D. 53525

Jeanne S. Lofgren, Esq.

PA I.D. 89078

125 First Avenue

Pittsburgh, PA 15222

(412) 391-8510 phone

*Attorneys for Debtor-in-Possession*

# EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	
TRUSTEES OF CONNEAUT LAKE	)	Bankruptcy Case No. 14-11277-JAD
PARK, INC.,	)	
	)	Chapter 11
Reorganized Debtor.	)	
_____	)	

**REPORT FOR BANKRUPTCY JUDGES IN CASES TO BE CLOSED**  
**CHAPTER 11 CASES**

X Plan Confirmed

\_\_\_\_\_ Plan Not Confirmed

If plan was confirmed and the case is still in Chapter 11, what percentage dividend was (or is) to be paid under the plan to the general unsecured class of creditors? 0.00%

I certify under penalty of perjury that the information provided on this form is true and correct to the best of my knowledge, information, and belief and that all estimated payments have been designated appropriately as such.

June 1, 2021  
DATE

Jeanne S. Lofgren  
PREPARER

*/s/ Jeanne Lofgren*  
SIGNATURE

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
	)	
TRUSTEES OF CONNEAUT LAKE	)	Bankruptcy Case No. 14-11277-JAD
PARK, INC.,	)	
	)	Chapter 11
Reorganized Debtor.	)	
_____	)	Document No. _____
	)	
TRUSTEES OF CONNEAUT LAKE	)	Relates to Doc. No. _____
PARK, INC.,	)	
Movant,	)	<u>Hearing Date &amp; Time:</u>
v.	)	June 25, 2021 at 11:00 a.m. VIA ZOOM
NO RESPONDENT,	)	<u>Response Deadline:</u>
Respondent.	)	June 18, 2021

**ORDER GRANTING FINAL DECREE**

AND NOW, this \_\_\_\_ day of June, 2021, upon consideration of the foregoing Report and Application for Final Decree (the "Application"), after notice and any hearing thereon, it appearing that the relief requested is in the best interests of the Debtor, its estate and creditors, and it further appearing that the Debtor's Plan<sup>1</sup> has been substantially consummated, it is hereby

**ORDERED** that the application for final decree is granted; and it is further

**ORDERED**, that this Court shall retain jurisdiction with respect to all issues related to matters as may be prescribed in the Plan and/or the Confirmation Order; and it is further

**ORDERED**, that except as provided in the preceding paragraph, the Debtor's bankruptcy case is hereby closed.

BY THE COURT:

\_\_\_\_\_  
JEFFERY A. DELLER  
UNITED STATES BANKRUPTCY JUDGE

<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning given to them in the Application.