



ZOOM, ZOOM, ZOOM!!

**By: Honorable Chief Judge
Caryl E. Delano**

Do you remember that old Mazda commercial, “Zoom, Zoom, Zoom?” I say those words to myself every day now! If anything good has come out of the COVID-19 pandemic, it has been that the Court and the Bar have experienced the benefits of embracing new technology. All of our judges are transitioning to at

least some Zoom hearings. And after months of telephonic-only hearings, we judges are so happy to see attorneys’ familiar faces on our video screens! The video hearings are so much easier for everyone involved, including attorneys who don’t need to drive to court and pay for parking. Even when life returns to “normal,” I predict that you will see the integration of video hearings into our regular calendars. And we can only expect videoconferencing capabilities to improve as time goes on.

As we all adjust to video hearings, and even some video trials, communication—among the attorneys and between the attorneys and the Court—becomes even more important. This puts the burden on attorneys, many of whom are used to working out their issues in the courthouse hallways before they walk into the courtroom, to actually TALK (or email or text) to each other before hearings. Please make a point of reaching out to your opposing counsel in advance of your hearings. It’s amazing how many issues can be resolved if the lawyers simply speak with each other. And, if a matter is settled before a hearing, please let the judge’s courtroom deputy know. This saves the judges and law clerks from unnecessarily preparing for hearings and also saves court time.

On a sad note, you all probably know that Rose Paskay passed away on September 23, 2020 (see her son Steve’s lovely tribute in the article below). Those of us in Tampa rarely saw Judge Paskay at a law-related social event without Rose being at his side. Rose devoted herself to caring for him and supporting his judicial career. She typed the manuscripts for each of his books (I’m hoping on an electric typewriter) and travelled across the country with him as he attended judicial conferences and seminars. For years, Rose travelled to Fort Myers twice a month in order to keep Judge Paskay company as he conducted hearings there.

After Judge Paskay passed away in 2012, Rose was delighted that she continued to be invited to the annual dinners of the TBBBA and the SWFBPA and to the keynote luncheon at the annual ABI/Paskay Seminar. Rose loved being the center of attention at the TBBBA's 2019 annual dinner. It was her 90th birthday, and she was thrilled when everyone sang "Happy Birthday" to her and presented her with flowers. It was only in the past year or so that she was no longer able to attend these events. In so many ways, Rose valued her relationships with the attorneys of the Middle District and the ways in which they kept Judge Paskay's memory alive. Her passing truly marks the end of an era.



Upcoming Events

- | | |
|--|---|
| November 3
12:00 p.m. | TBBBA Consumer Webinar - <i>Understanding and Identifying Potential Class Actions: How Bankruptcy Counsel Can Assist their Clients, Deter Predatory Behavior, and Identify Additional Revenue From Their Cases</i>
Presented by Brian Shrader of Shrader Law, PLLC |
| November 4
4:30 p.m. | Virtual Portrait Presentation - Father C. Timothy Corcoran, III
Retired U.S. Bankruptcy Judge |
| November 5 & 6 | <u>Bankruptcy Law & Practice: View from the Bench</u>
Tampa (November 5), Miami (November 6) |
| December 1 &
January 5
12:00 p.m. | TBBBA Consumer Webinars |
| December 8 &
January 12
12:00 p.m. | TBBBA CLE Webinars |
| January 13-16 | <u>Florida Bar Winter Meeting</u> |



CASE LAW UPDATE FOR Q4 2020 ISSUE OF THE COURT CONNECTION

Editors:

Bradley M. Saxton & C. Andrew Roy, Winderweede, Haines, Ward & Woodman, P.A.; and Kathleen L. DiSanto, Bush Ross, P.A.

Eleventh Circuit Opinions

SE Property Holdings, LLC v. Gaddy (In re Gaddy)

2020 WL 5793082, 2020 U.S. App. LEXIS 30973 (11th Cir. Sept. 29, 2020)

In an opinion authored by Judge John Antoon, U.S. District Judge for the Middle District of Florida, sitting by designation, the Eleventh Circuit narrowly applied the Supreme Court's opinion in Husky International Electronics, Inc. v. Ritz, 136 S. Ct. 1581 (2016), and affirmed the lower court's judgment on the pleadings dismissing the creditor's claims brought against the debtor under §§ 523(a)(2)(A) and (a)(6) of the Bankruptcy Code.

The debtor was one of several guarantors of a \$12.5 million corporate debt. After the company experienced financial difficulties, and just two weeks after demand on the guaranty from the creditor, the debtor began transferring assets to his wife and daughter. The debtor continued the transfers even after the creditor sued on the guaranty. After the creditor sued to set aside fraudulent transfers under state law, the debtor filed a Chapter 7 petition. The creditor sought to except the guaranty debt from discharge under §§ 523(a)(2)(A) and (a)(6).

The Eleventh Circuit upheld the judgment on the pleadings and, thus, allowed the debtor to discharge the guaranty indebtedness. The circuit court rejected the creditor's reliance on Husky, calling the creditor's position a "strained interpretation of" Husky. The court concluded there was no fraud or willful and malicious injury at the time the debt was created. Unlike Husky, the fraudulent acts did not create the debt; the debt existed prior to the fraudulent acts. Therefore, the debt was not "obtained by" fraud as required by § 523(a)(2)(A). As to § 523(a)(6), even assuming the debtor attempted "to thwart a creditor's collection efforts by fraudulently conveying assets," the underlying debt did not arise "as a result of" a willful and malicious injury.

Whaley v. Guillen (In re Guillen)

972 F.3d 1221 (11th Cir. Aug. 25, 2020)

Chapter 13 debtor sought to modify confirmed Chapter 13 plan to include additional attorney's fees incurred in connection with an adversary proceeding to challenge the validity of bank's mortgage lien. The Chapter 13 Trustee objected to modification, contending the modified plan violated the best interest of creditors test and that res judicata barred the modification. In affirming the Bankruptcy Court's order modifying the plan, the Eleventh Circuit held that "a debtor need not make any threshold showing of a change in circumstances before proposing a modification to a confirmed plan under § 1329."

Law Solutions of Chicago, LLC v. Corbett

971 F.3d 1299 (11th Cir. Aug. 21, 2020)

Chicago-based law firm, which qualified as a debt relief agency, solicited clients through the internet and referred the clients to "partners" located where the client resides. The firm charged a flat fee to cover representation in a Chapter 7 bankruptcy case, but the attorney disclosures excluded certain services that a Chapter 7 debtor might need. The Bankruptcy Administrator asserted various claims against the firm, which were ultimately settled. Among other things, the firm agreed to provide the excluded services without additional charge, pursuant to the terms of the settlement agreement. During an audit of the firm's cases, the Bankruptcy Administrator discovered the firm was continuing to file disclosures excluding certain services. The Bankruptcy Administrator filed motions to examine, which sought a determination as to whether the law firm violated the terms of the settlement agreement. The firm immediately filed amended disclosures that were in compliance with the settlement agreement. Based on the inaccurate attorney disclosures filed by the firm and the non-compliance with the terms of the court-approved settlement, the Eleventh Circuit held that the Bankruptcy Court had the power to impose civil sanctions under Bankruptcy Rule 9011, its statutory contempt power under § 105 of the Bankruptcy Code, or its inherent contempt authority under § 526 and § 707 of the Bankruptcy Code.

Bankruptcy Court Opinions

In re: Thomas

618 B.R. 585 (Bankr. M.D. Fla. Aug. 20, 2020) (McEwen, J.)

Creditor Amscot's refusal to cash a check based on the debtors' outstanding debt owed to Amscot was not a violation of the automatic stay because the "sliver of the stay" terminated by operation of law thirty days after the filing of the bankruptcy case, as the debtors had one prior case pending within one year of the current case filing. In adopting the majority position, the Court acknowledged the circuit split existing with respect to the extent of the

expiration of the stay for a debtor who had one prior case pending within one year of the current case filing and whether the automatic stay terminated in its entirety or only the sliver of the stay terminated as to the debtor and property of the debtor.



IWIRC WOMAN OF THE YEAR IN RESTRUCTURING AWARD PRESENTED TO JUDGE JENNEMANN

On Friday, October 16, 2020, the International Women's Insolvency & Restructuring Confederation presented its annual Woman of the Year in Restructuring Award to Hon. Karen S. Jennemann. Following are the remarks presented by Leyza Blanco, IWIRC Vice Chair, at the awards ceremony that was held in Judge Jennemann's courtroom and attended virtually by members and friends from around the world:

Welcome to IWIRC, the International Women's Insolvency & Restructuring Confederation. We at IWIRC are committed to being the premier organization devoted to enhancing the professional status of women in insolvency & restructuring.

Each year, IWIRC honors a woman for her recent contributions to or lifetime achievements as part of the insolvency and restructuring industry with the Woman of the Year in Restructuring (WOYR) Award. The winner of this award has had an extraordinary legal career making lasting contributions to the insolvency and restructuring profession.

This year we present this award to a woman who for more than 36 years, in the busiest bankruptcy district in the US, has inspired, helped, mentored, and supported other women. She has not only directly mentored many women, but she has impacted and inspired the innumerable women who have appeared in her courtroom. From attorneys, to expert witnesses, to party representatives, she has inspired us all by example. Excelling in a profession and in an area dominated by the old guard and showing us what was possible by paving the way, becoming the first female bankruptcy judge and the first female chief judge. This year we present the 2020 Woman of the Year in Restructuring Award to Judge Karen Sue Jennemann. Through her leadership and service, Judge Jennemann has developed several programs improving the administration of the Bankruptcy Court and its service to the public.

She was instrumental in unifying the Bankruptcy Court for the Middle District of Florida, making it possible for the Southern and Northern District Bankruptcy Courts of Florida to coordinate on many procedures. Always devoted and a constant supporter of IWIRC, actively participating in our events and a strong supporter of other women, this year she adds the WOYR award to a list of other meritorious awards, most recently the Florida Chief Justice's Distinguished Federal Service Pro Bono Award and the Orange County Bar's Professionalism Award for her high ethical conduct, courtesy, and professional behavior. Her immeasurable impact on the lives and careers of women make her an exceptionally deserving recipient of this award.

An exemplary career in the restructuring community and beyond, Judge Jennemann consistently personifies IWIRC's mission. She has often provided guidance on a variety of issues to her colleagues. Consistently a supporter of many organizations, including Dress for Success, empowering women to achieve economic independence, Judge Jennemann has helped women thrive. An embodiment of IWIRC's fostering of growth and celebration of success, I am honored to present the Woman of the Year in Restructuring Award today to Judge Karen Sue Jennemann.



Photos courtesy of Business PhotoPros.



Make Me Smile Moments

By Honorable Catherine Peek McEwen

Pro Bono Volunteer

Kudos to William Kopp, who stepped in to help a floundering debtor who was trying to modify her mortgage and strip a lien in a chapter 13 case. Judges love pro bono volunteers!

Redemptions and Surrender Success Stories

1. Pro se Debtor R.F. had a 2004 Lexus and owed One Main almost \$6,000 on it. Instead of reaffirming the debt, he redeemed the car for only \$2,000.
2. Debtor L.E., represented by Laurie Blanton, had a 2007 Ford Fusion and owed Lendmark more than \$10,000 on it. The debtor was able to redeem the car for only \$500.
3. Pro se Debtor D.C. had a 2018 Dodge Journey and owed Santander more than \$21,500 on it. He was able to redeem the car for \$14,100.
4. Debtors S.G. and C.G. had a net negative income of almost \$11,000 as they had suffered a loss of income due to the pandemic. Their car payment was \$600 a month, and they were upside down in equity by about \$4,000. After being advised of their options concerning reaffirmation, they made the decision to surrender the car instead of reaffirming. And they thanked me for letting them have the time to investigate the options and become comfortable with their decision (we continued the initial hearing four times).

**William J. Simonitsch Joins Region 21 Team
as Assistant U.S. Trustee, Orlando Office of U.S. Trustee
By: Nancy J. Gargula, United States Trustee, Regions 10 and 21**



It is my distinct honor and pleasure to introduce William (“Bill”) J. Simonitsch who has joined the Region 21 Team as the Assistant U. S. Trustee (“AUST”) in our Orlando Office. Bill brings a wealth of knowledge and experience to his new responsibilities as AUST. As a former partner with K&L Gates, LLP, where he worked for 17 years, he has represented secured and unsecured creditors, debtors and asset purchasers in bankruptcy proceedings, assignments for the benefit of creditors, commercial foreclosures, and judgment enforcement actions. Bill also has extensive trial and arbitration experience for a wide array of industries in state and federal commercial lawsuits and arbitrations nationwide. He also served as interim in-house counsel for a firm client that was a publicly traded company with nationwide operations. Bill has held a variety of leadership positions in the Bankruptcy Bar Association for the Southern District of Florida, the American Bar Association, and the National Asian Pacific American Bar Association, including serving as President for the 2013-2014 term. He also served on the Unincorporated Business Entities Study Group in connection with the National Conference of Commissioners on Uniform State Laws. Bill received both his Bachelor of Arts and Master of Arts degrees from Florida State University. His Juris Doctor degree was conferred, *magna cum laude*, by the University of Miami School of Law, where he served on the Law Review Editorial Board and was a member of the Order of the Coif. Bill and his family recently relocated from Miami to Celebration, Florida.

We are very pleased to have Bill joining the United States Trustee Program and our Region 21 Team and know that with his breadth of knowledge and experience he will bring great value to the important work of the United States Trustee Program. I hope you will join me in welcoming AUST Bill Simonitsch to the Middle District of Florida.

I would also like to extend a very special thank you to AUST Charlie Edwards who has served as the Acting AUST and led the Orlando Team since April of this year, while also carrying out his many duties as AUST in the Tallahassee Office. Charlie has provided exemplary leadership during this critical time.



**Retired Bankruptcy Judge, Father C. Timothy Corcoran, III,
to be Honored at Portrait Presentation Ceremony
on November 4, 2020**



On November 4, 2020, at 4:30 p.m., the Court will host a virtual portrait presentation ceremony of the official portrait of retired United States Bankruptcy Judge, Father C. Timothy Corcoran, III.

The presentation will be broadcast via Zoom from Courtroom 9B, Father Tim's former courtroom. Father Tim and the Tampa Division Bankruptcy Judges plan to attend in person, and all others may join by Zoom. Attendance will be limited to the first 100 registrants.

In 1989, Father Corcoran was appointed by the Eleventh Circuit Court of Appeals as a United States Bankruptcy Judge for the Middle District of Florida in the Orlando Division. In 1993, he transferred to the Tampa Division where he served until his retirement in 2003. Father Tim devoted the first five years of his "retirement" to a successful "bet the business" bankruptcy and mediation practice. Then he turned to a new vocation and returned to school. For four years, Father Tim studied at Blessed John XXIII National Seminary in Boston, Massachusetts. In 2012, he was ordained a Roman Catholic priest in the Diocese of St. Petersburg. Father Tim now serves as the pastor of St. Mary Catholic Church in Tampa.

Information regarding registration for the November 4 ceremony and the Zoom link will be provided shortly.



HISTORY CORNER



Left to right: Hon. Jerry A. Funk, Hon. Karen S. Jennemann, Hon. George L. Proctor,
Hon. Paul M. Glenn, Hon. Alexander L. Paskay, Hon. C. Timothy Corcoran, III,
Hon. Thomas E. Baynes, Hon. Arthur B. Briskman

Judges of the United States Bankruptcy Court Middle District of Florida

July 1999

**Judge Briskman's Courtroom
Orlando**

In Memoriam - Rose Paskay



Rose Paskay, wife of Hon. Alexander L. Paskay, passed away on September 23, 2020. Due to COVID concerns, a memorial service will probably be held later this year.

The Paskays' son, Steve, captured the essence of Rose's personality in her obituary, published in the *Tampa Bay Times* on September 27. If you enjoy Steve's delightful writing style, you may be interested to know that he was one of the original producers of *America's Funniest Home Videos*.

It is with great sorrow I announce the death of my mother on the evening of Sept. 23rd, Rose Paskay age 91. Rose was also the mother to her late son Rick and the wife of her late husband of 62 years, the Hon. Judge Alexander Paskay who passed in 2012. And, as for Licia, Mom always thought of Licia as the daughter she never had. Rose was the little engine that could! Although only 4'6" (on a good day) Rose packed that little body with a great big heart full of love, a noggin full of wisdom and a spirit full of moxie. Mom died as she wanted to pass, here at her home, lying under the official court portrait of my father with myself and her cat Maggie by her side. Rose was born in Brooklyn and therefore always hated the damn Yankees. After WWII she moved with her parents to Miami where she met her future husband, a jobless war refugee named Alex. He asked Rose to marry him only a week after meeting her because she was just so darn cute. Plus Rose had a steady job at the bank! Rose moved to Tampa in 1962 where she took care of her family, attended

countless oh so chic cocktail parties, once bowled a score of 297, and actively volunteered; first with the Red Cross for 5 years and then the Moffitt Cancer Center for 37 years. Rose was always up on current events and not shy about telling you what she thought regarding the news of the day or how to get that stain out of your shirt. She'd like to be remembered as: the lady who got that pedestrian crosswalk installed on Westshore at Melrose, a damn good cook, and as a loving wife and mom. Rose will now be reunited with her husband Alex and her son Rick for eternity. She leaves behind hundreds of people who loved her and thousands of people whose lives she enriched in her 91 years on Earth. Now that she's in Heaven she's ready to show God, or anyone else, how to properly fold a fitted sheet.

Sympathy cards may be addressed to:

Steve & Licia Paskay
2226 Greenfield Ave.
Los Angeles, CA 90064

Memorial contributions may be made to:

Alexander L. Paskay Scholarship Fund
Stetson University College of Law
1401 - 61st Street S.
Gulfport, FL 33707
<https://www.stetson.edu/portal/law/>

or

The Humane Society
3607 N. Armenia Ave.
Tampa, FL 33607
<https://humanesocietytampa.org>



Celia Rodenmeyer Retires after 35 Years with the Court

On September 30, 2020, Celia Rodenmeyer, the Bankruptcy Court's Human Resources Manager, retired after 35 years of service.

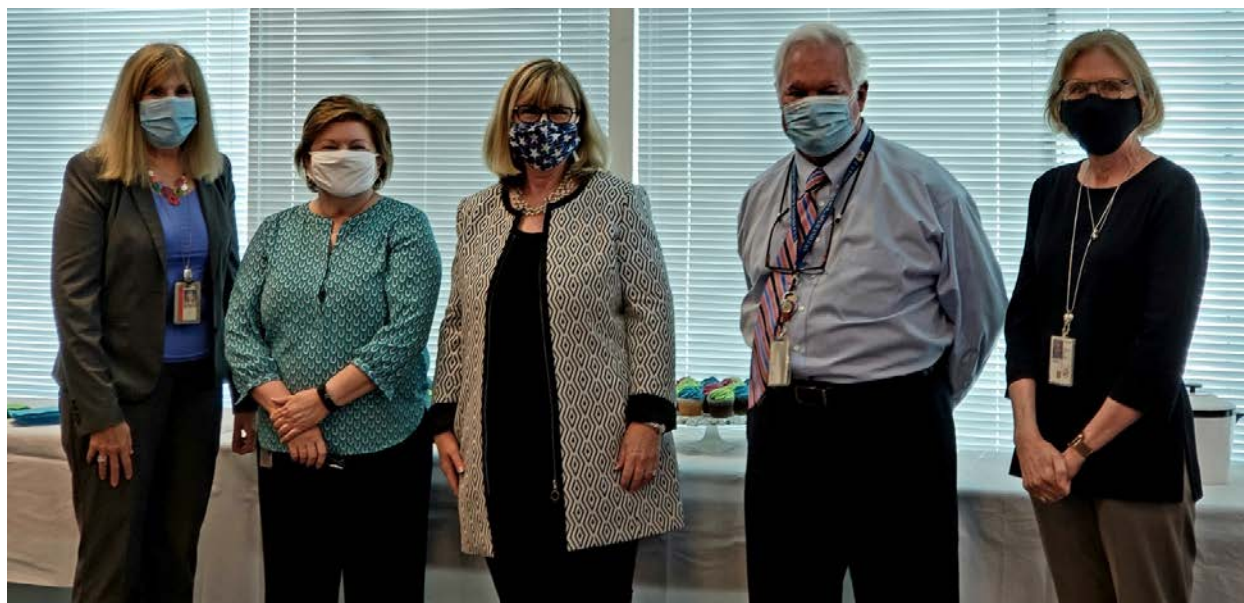
During the Virtual Tampa Employee Recognition Awards Ceremony on September 4th Chief Judge Delano expressed her deep appreciation for Celia's contributions over the past 35 years. Judge Delano recognized Celia's outstanding performance and the tireless effort that were the hallmarks of Celia's career. Judge Delano also spotlighted certain high points of Celia's time with the Court.

Celia began as a Case Administrator on September 18, 1985 and within two years was promoted to Supervisor. She held the position of Administrative Analyst and then Personnel Specialist until she was promoted to Human Resources Manager in 1999. In her twenty years as Human Resources Manager, Celia was a prominent figure in the Court and touched every one of our lives in some way. Celia trained us on innumerable topics and always readily offered her guidance and wisdom. Celia led us through CPS conversion, introduced us to HRMIS, and was a driving force in the development and implementation of ePerformance. Her dedication to the Website Committee has empowered Court staff with the ability to easily and quickly access volumes of information. Up until her very last days, Celia was providing the Court with invaluable tools to use far into the future.

Celia did not want a large retirement celebration, so on September 24th a small group gathered in Tampa to celebrate Celia and her well-deserved retirement. Several judges and staff members spoke very fondly of Celia, her perpetual calm demeanor, her kindness, and what her many contributions meant to them. Celia also shared funny stories of when she first started with the Court as a Case Manager. She reminisced about having to keep her knee on the paper tray of the copy machine because it would not latch and having only one computer to be shared by all the case managers. The good old days!

Celia was proud of her career with the Court and said she would miss interacting with everyone. As Judge Delano commented, Celia will be deeply missed, but her defining impact on the Court will make her often remembered.

Congratulations Celia!



Pictured behind the masks (Left to Right): Clerk Sheryl Loesch, Celia Rodenmeyer, Chief Judge Delano, Judge Williamson, and Judge Colton



Pictured (Left to Right): Judge McEwen, Celia Rodenmeyer, and Dedra Gann



Mary Henry Retires
By: Kathy Deetz, Deputy-in-Charge, Orlando Division



On September 30, 2020, the Orlando Division said good-bye to a wonderful and valued employee Mary Henry, who recently celebrated 23 years with the Bankruptcy Court. She was hired on August 4, 1997, as an intake clerk and shortly thereafter was promoted to a case manager position for Judge Jennemann's team. Throughout her career, she remained steadfast, committed, and in her own words, proud to serve and support all the judges throughout the district.

The Orlando Division wishes Mary the best for her next adventure; however, she leaves behind a loss that may never be filled. Not only was Mary a dedicated and highly knowledgeable employee, but most of all she was and will always be part of our family.



Linda Lee Retires

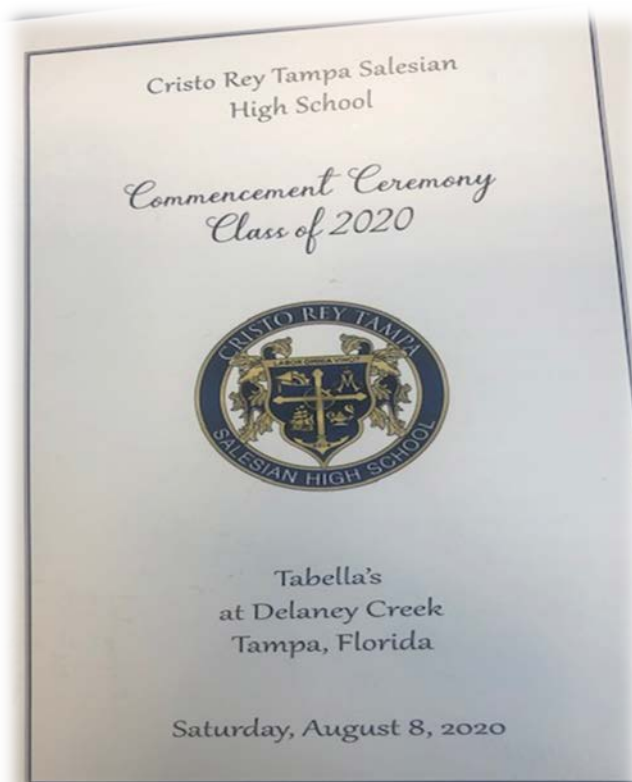
By: Gull Weaver, Deputy-in-Charge, Jacksonville Division



On September 30, 2020, via Zoom, we celebrated the retirement of Linda Lee from the Jacksonville Division. Linda came to the court in October of 2002 right before we moved into our new courthouse. Linda started as an intake clerk and was promoted to case manager in 2006. She was a valuable asset to the Jacksonville Division. Due to the current situation, we couldn't have our normal celebratory send off, but we were able, through Zoom, to say good-bye!



Cristo Rey Tampa Salesian High School's first graduation class since the creation of this work-study institution four years ago included three former "employees" of our Court, Junior Judicial Assistants Abi'ya Wright, Amali Turner, and Armando Diaz. They are now in college at, respectively, Dominican University, Albion College, and the University of Central Florida.





Abi'ya Wright



Amali Turner



Armando Diaz

Corporate Work Study Program Partners 2019-2020

Our Corporate Work Study Program Partners work tirelessly to provide our students a professional work experience. A special thank you to these companies and the supervisors who support the mission of Cristo Rey Tampa.

AVIATION & AEROSPACE Aerosonic LLC

ARTS & CULTURE David A. Straz, Jr. Center for The Performing Arts

BANKING First Citrus Bank

COMMUNITY ORGANIZATIONS Catholic Charities

Connect & Propel Tampa Bay, Inc.
Dive Heart

Girls Scouts of West Central Florida
Metropolitan Ministries

Nativity Catholic Church
Nonprofit Leadership Center

Junior Achievement
Seniors in Service of Tampa Bay, Inc.
Mary Help of Christians Center

Positive Impact Force

CONSUMER PRODUCTS & SERVICES American Roofing and Sheet Metal Polo Logistics LLC

EDUCATION The Collaboratory Preparatory Academy

ENERGY TECO Energy

ENGINEERING Hahn Engineering

FINANCIAL SERVICES Amuni Financial

BAIRD
Ernst & Young
JP Morgan Chase & Co.
Munoz and Company

Corporate Work Study Program Partners 2019-2020

FINANCIAL SERVICES (continued) Provis

Step Up for Students
Rivero, Gordimer & Company

FOOD SERVICES Bay Food Brokerage

HEALTHCARE Advent Health BayCare Health Systems, Inc. Moffit Cancer Center Tampa General Hospital

INSURANCE Baldwin Risk Partners Providence Benefits Solutions

LAW Bush Ross, P.A.

MANUFACTURING Gulfcoast Supply Masonite

OFFICE OF GOVERNMENT Hillsborough County Sheriff's Office Tampa Hillsborough County Expressway Authority State Representative Adam Hattersley U.S. Bankruptcy Court

PUBLIC AFFAIRS MGT of America Consulting Group LLC

REAL ESTATE & COMMERCIAL DEVELOPMENT Banyan Street Capital

CBRE
InvestRes
MI Homes of Tampa, LLC
Ryan Companies US, Inc.

SPORTS & ENTERTAINMENT Tampa Bay Lightning The Florida Aquarium

TECHNOLOGY BST Global, Inc.

Meet Matthew and Jonathan

Speaking of Cristo Rey students, this year we have two young men working for our Court, Matthew Efem and Jonathan Lopez. Matthew is a junior; Jonathan is a sophomore. They work for Judge McEwen's chamber as Junior Judicial Assistants but are available to assist any chamber or staff with tasks such as creating spreadsheets, researching on the 'net, filing, shredding, printing documents off CM/ECF to create indexed hearing binders, and answering the phone.



Matthew loves the English vocabulary and to create things with computer objects. His goals are to go to the University of Tampa, join the Air Force and go to law school to become a Judge Advocate General Officer, then become an Article III federal judge. Self-described interesting facts about him: In junior high, he was a thespian and won the highest grade at district and the second highest grade in the state for his script writing.

Jonathan's favorite class is theology because he learns more about his religion. His least favorite thing is to be bored. His goals are to attend the University of Central Florida and become a DEA agent, Gang Unit Officer, or real estate agent. Self-described interesting facts about him: He is Mexican and Puerto Rican and can play the tuba and electronic bass.



COVID-19: Words of the Year

Every year, Merriam-Webster adds new words to the dictionary and selects a **Word of the Year**. In previous years, these have been things like blog, YOLO, google (as a verb), or jockumentary.

If there is one thing that COVID has accomplished, it has increased our vocabulary! We are all now pretty familiar with terms like social distancing, PPE, flattening the curve, quarantine, and pandemic, but what about the rest?



2020 COVID WORD OF THE YEAR CONTENDERS!

Doom-scrolling: constantly refreshing your feeds for the latest on the pandemic. Give yourself a mental health break and limit your news updates to once per day.

Coronasomnia: insomnia affecting 20-30% of us during the pandemic. Heightened stress and upset routines have led to less or poorer sleep that can impact productivity, affect tempers, and increase the risk of hypertension or depression.

Quarantini: the beverage of choice for those at home during or because of the coronavirus. See also: coronarita, virtual happy hour, walktail.

COVID-10: the extra weight you may have acquired during the pandemic due to less movement, more snacking, and closed gyms. Warning: may not be limited to 10 pounds.

Hamstering: the hoarding of pandemic supplies (e.g. toilet paper, disinfectant) much like a hamster stuffs its cheeks.

Othering: Stigmatizing people who have contracted COVID-19 or for actions individuals are or are not taking to stay healthy. This may take the form of “good natured joking” with your coworkers about their “COVID vacation,” their daily disinfection routine, or that they don’t believe in the virus. Your coworkers may not

find it funny at all. See also: covidiot, moronavirus, coronacation, sheeple, coronaphobia.

Quaranteam: the group of people you live with. See also: bubble, germ pod.

Co-bubbling: the mixing of your quaranteam/bubble with another that has similar behavioral patterns for COVID avoidance.

Long haulers: Individuals who suffer from symptoms of COVID-19 weeks to months following infection; many are very sick, but not sick enough to be hospitalized.

Infodemic: the widespread misinformation about the COVID-19 pandemic including unsubstantiated claims, conspiracy theories, or disinformation aimed at undermining trust in health experts and institutions. Get your COVID-19 news and information from trusted sources.

Zoomiform: the carefully selected outfit you wear for the camera to give the impression you are a productive, professional member of the team that has showered in the last 24 hours. Gym shorts and a collared shirt/tie = zoomiform.

Maskne: skin irritation or acne caused by heat, friction, and sweat from prolonged wear of your face covering. Wash your face and mask regularly, and avoid makeup.

Revenge travel: Travelers disgruntled by canceled and postponed trips who are planning bigger trips for 2021. This pent-up demand = revenge travel.

[Originally published by the United States Special Operations Command (SOCOM) Surgeon]

A Karaoke Duet



Bankruptcy does rock, doesn't it? Abraham Akbari, a temporary law clerk for our Court in the recent past, performs a karaoke duet with bankruptcy attorney/Judge-Elect Wendy DePaul. The two worked together on planning to re-open the pro bono clinic in Tampa as a telephonic clinic. We hope that becomes a reality.

JUDGES SHOW THEIR TEAM SPIRIT



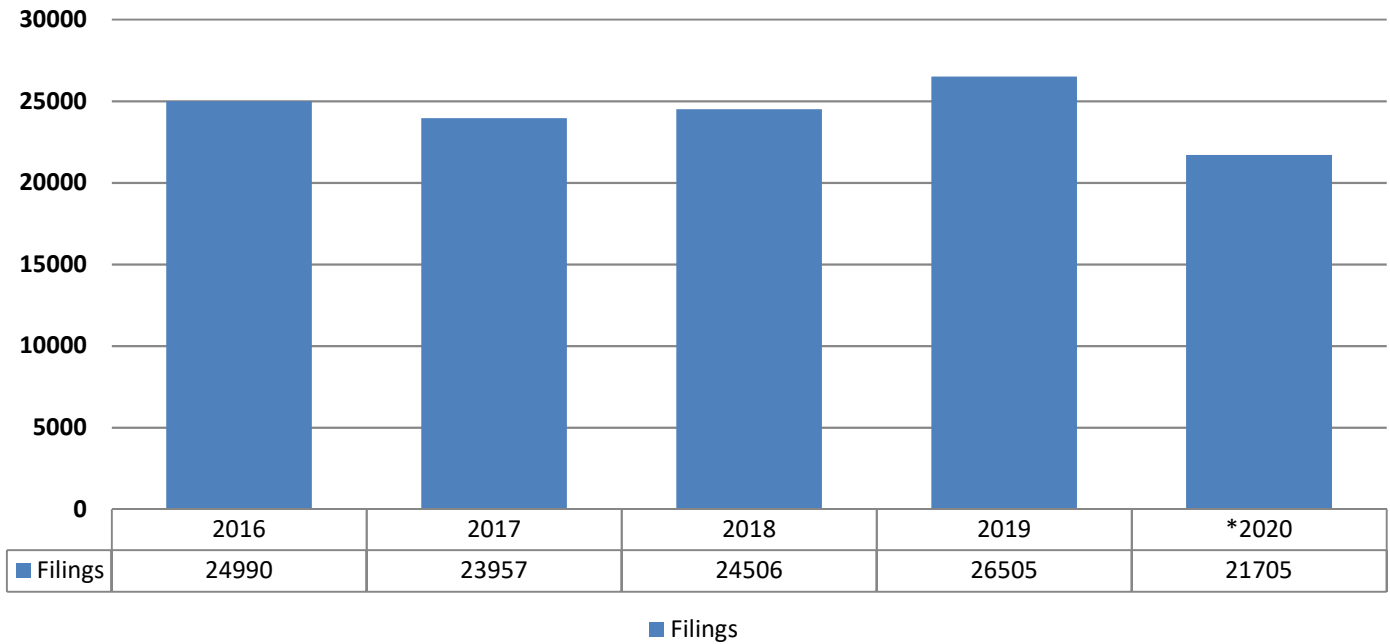
Judge McEwen's Rays fan cutout watches over the courtroom when court is not in session.



Judge Colton with her dog Nike's Rays fan cutout, signed by #35 Nate Lowe. Judge and Nike say Go Rays!

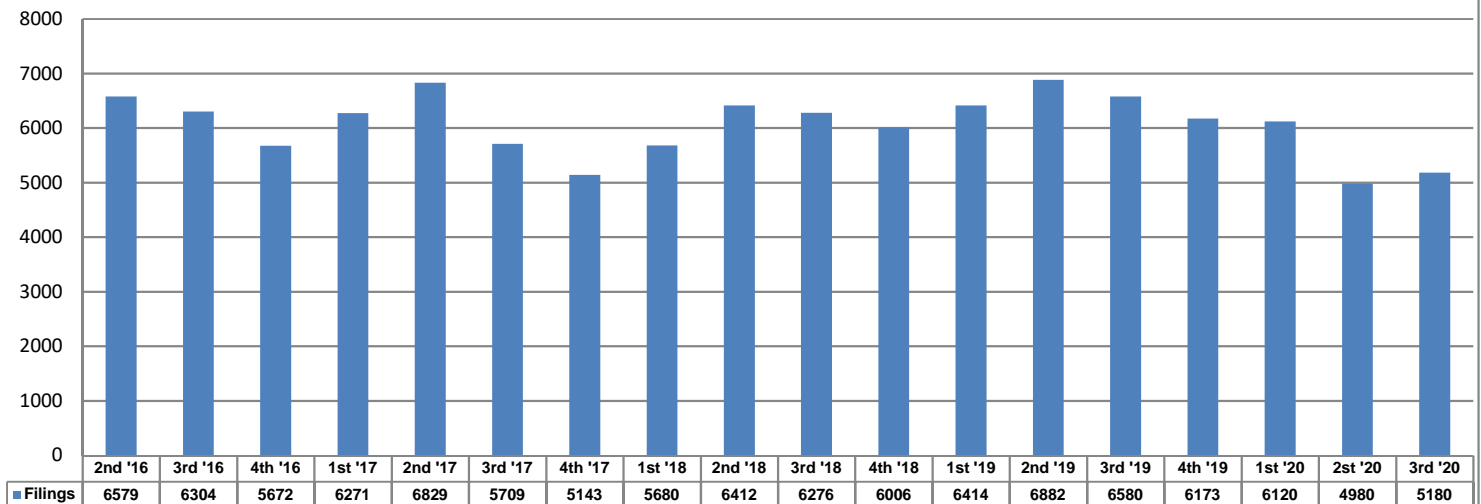
United States Bankruptcy Court - Middle District of Florida
Updated October 25, 2020 Meeting Data and Information
Statistics as of September 30, 2020

Annual Filings

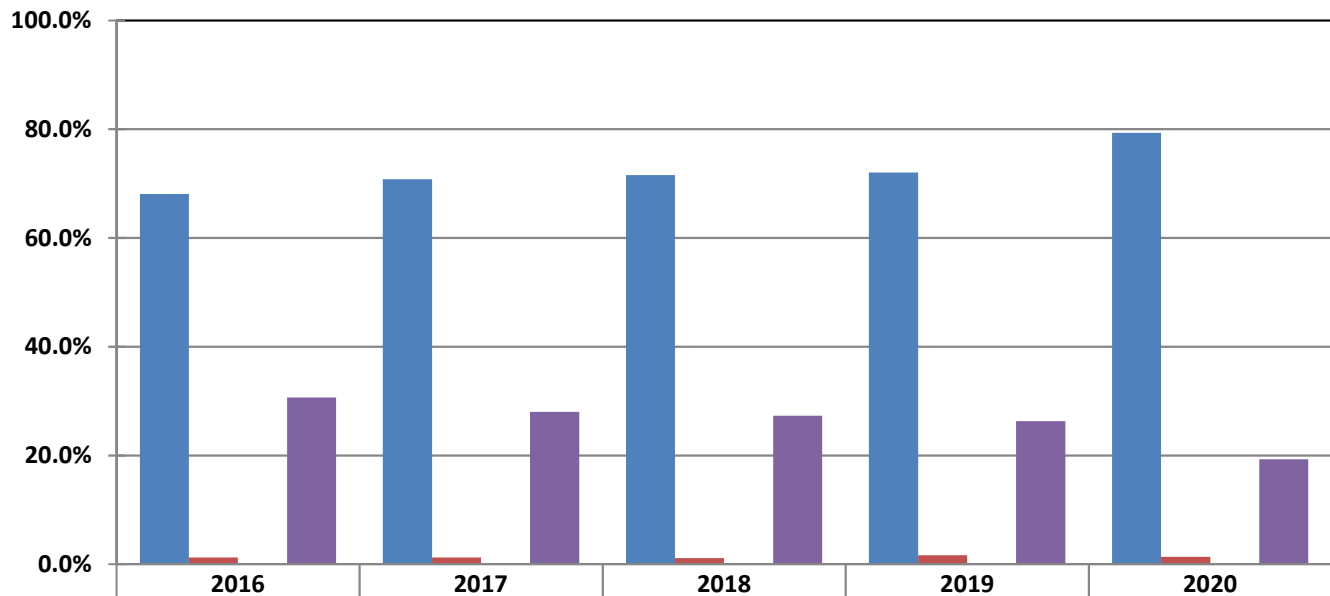


Year	Annual Filings	vs. 2015	vs. Prior Yr.
2015	30112		
2016	24990	-17%	-17%
2017	23957	-20%	-4%
2019	26505	-12%	11%
*2020	21705	-28%	-18%

Filings by Quarter

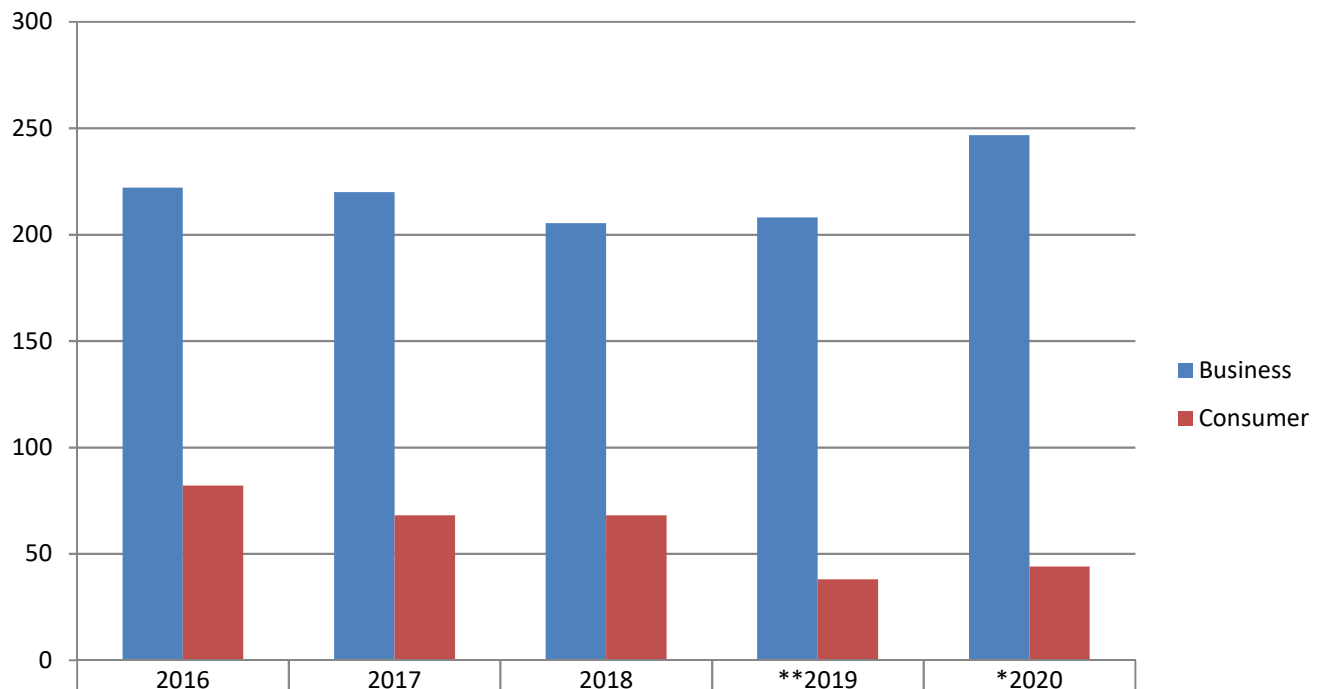


Filings by % of Chapter Type



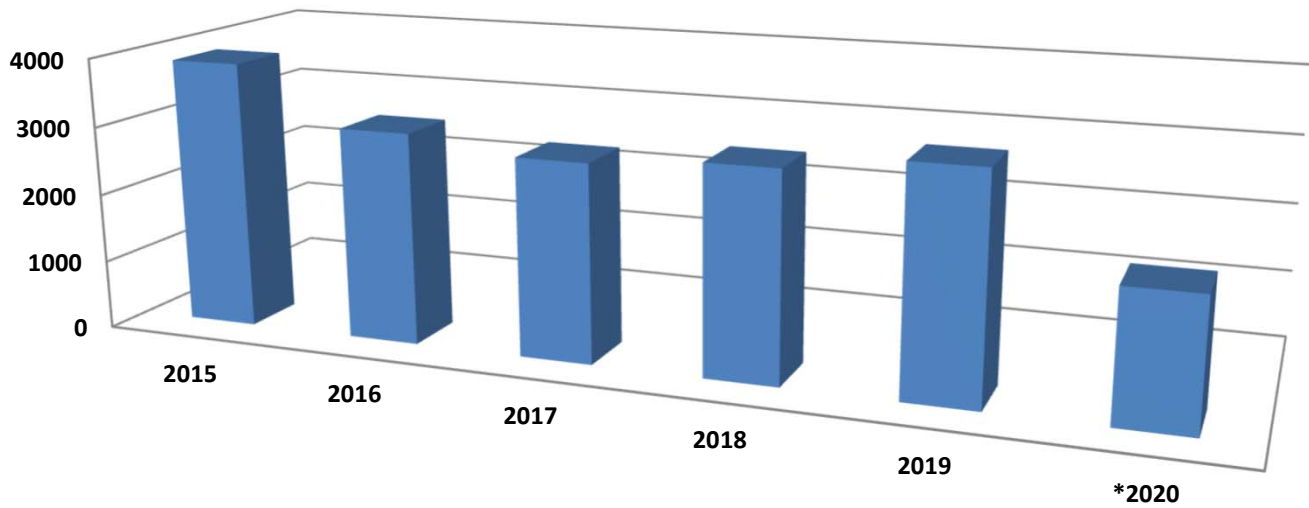
Chapter 7	68.1%	70.8%	71.6%	72.0%	79.3%
Chapter 11	1.2%	1.2%	1.1%	1.7%	1.3%
Chapter 12	0.0%	0.0%	0.0%	0.0%	0.0%
Chapter 13	30.7%	28.0%	27.3%	26.3%	19.3%

Chapter 11 Filings



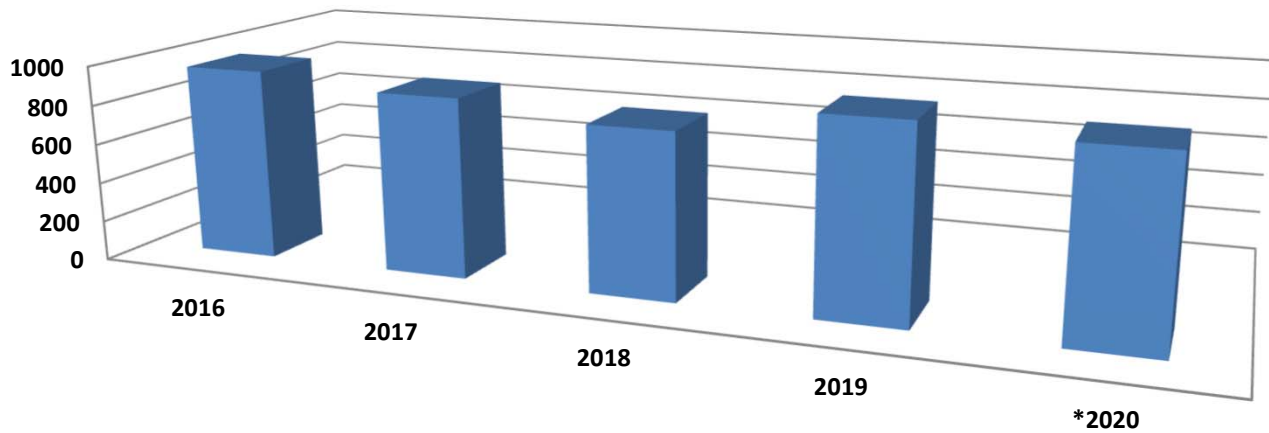
Business	222	220	205	208	247
Consumer	82	68	68	38	44

Pro Se Filings



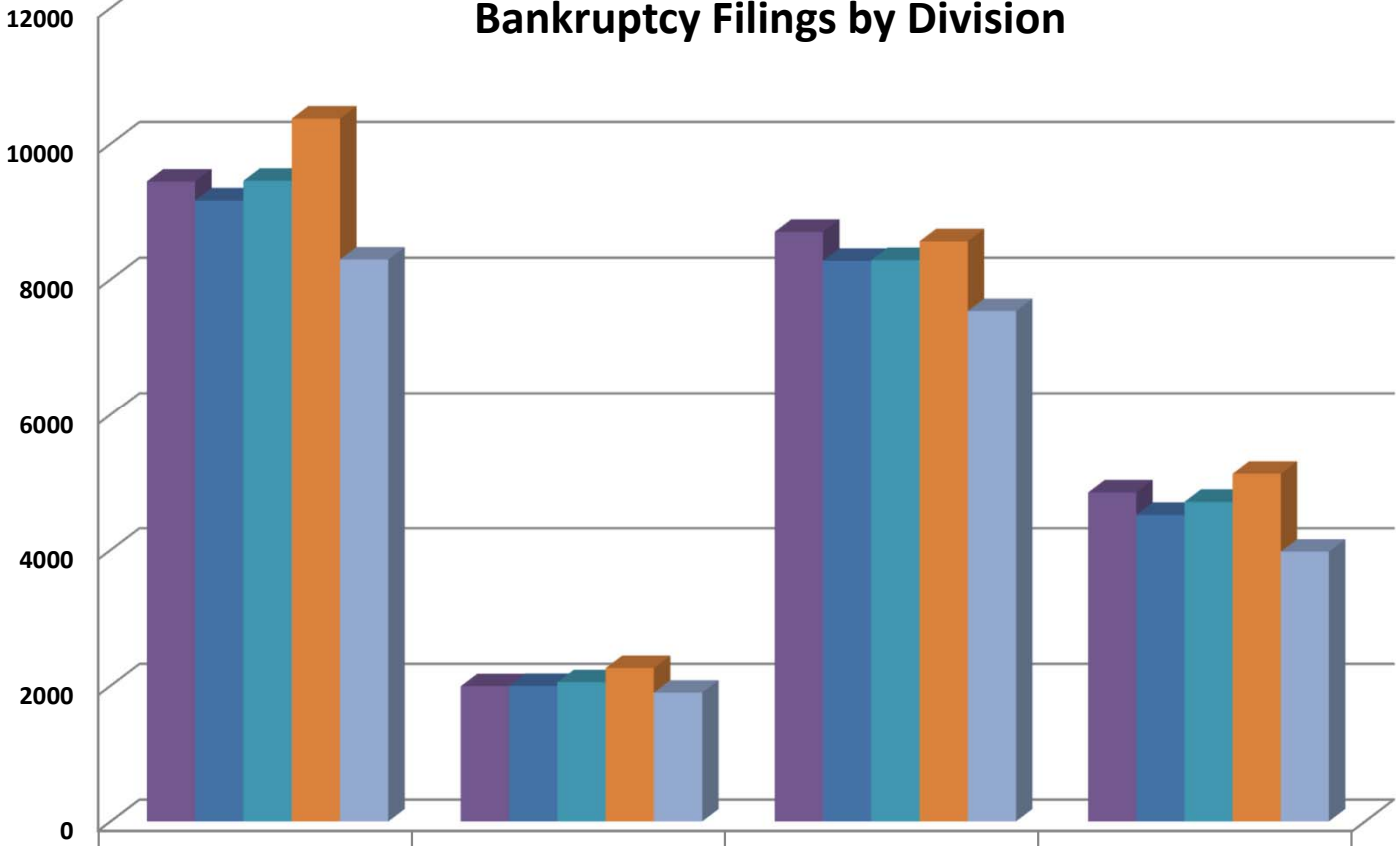
	2015	2016	2017	2018	2019	*2020
Pro Se	3902	3079	2868	3006	3232	1868
% of All Filings	16%	13%	12%	12%	12%	9%

In Forma Pauperis Filings



	2016	2017	2018	2019	*2020
IFP Granted	965	903	825	956	911
% of All Filings	4%	4%	3%	4%	4%

Bankruptcy Filings by Division



2016	9445	1993	8703	4849
2017	9166	1997	8276	4518
2018	9456	2052	8288	4711
2019	10372	2260	8564	5124
2020	8296	1899	7536	3975

Note: Counts include reopen cases
 Order Granting IFP counts have been corrected to include approving language.