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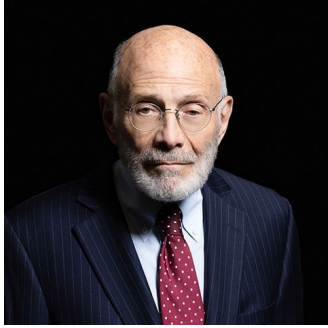
Ninth Circuit Limits Substantive Consolidation

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Affirming the lower courts' denial of a Chapter 7 trustee's motion to consolidate substantively the debtor's estate "with the estates of various non-debtors," the U.S. Court of Appeals for the Ninth Circuit, held that a "party moving for substantive consolidation must provide notice of the motion to the creditors of a putative consolidated non-debtor." *In re Mihranian*, 2019 U.S. App. LEXIS 27108 (9th Cir. Sept. 9, 2019). In this article, of counsel Michael Cook discusses the bankruptcy court's decision in *Mihranian* and its analysis of substantive consolidation.

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**Michael
Cook**

Of Counsel
New York

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