

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:) Chapter 11
)
EASTERN LIVESTOCK CO., LLC,) Case No. 10-93904-BHL-11
)
Debtor.) Hon. Basil H. Lorch III

**JOINT MOTION TO EXTEND DEADLINE TO FILE SCHEDULING ORDERS IN
CERTAIN CONTESTED MATTERS**

Counsel for James A. Knauer, as Chapter 11 Trustee for Eastern Livestock Co., LLC ("Trustee"), Joplin Regional Stockyards ("Joplin"), Piedmont Livestock, Inc. ("Piedmont"), Hilliard–McKetrick Investments, Inc. d/b/a Arcadia Stockyard; Cattlemen’s Livestock Market, Inc.; Columbia Livestock Market, Inc.; Hardee Livestock Market, Inc.; North Florida Livestock Market, Inc.; Ocala Livestock Market, Inc.; Okeechobee Livestock Market, Inc.; Sumter County Farmers Market, Inc.; and Madison County Livestock Market, Inc. d/b/a Townsend Livestock Market; Ron Sizemore Trucking, Inc.; Oak Lake Cattle Co.; Eagle Bay, Inc.; and Daniel M. Byrd (collectively, the "Florida Creditors" and collectively with Trustee, Joplin and Piedmont, the "Parties") respectfully request that the Court enter an order extending the deadline by which the Parties' must submit proposed scheduling orders (the "Scheduling Orders") for proposed proceedings to resolve their respective contested matters. In support of this motion ("Motion"), the Parties state as follows:

1. On May 23, 2011, the Trustee filed he *Trustee's Purchase Money Claims Report, Motion To Transfer Funds And Notice Of Release Of Proceeds From Account* [Dock. No. 501] (the "Purchase Money Claims Report").

2. Joplin, Piedmont, and the Florida Creditors all filed objections to the Purchase Money Claims Report, initiating separate contested matters with respect to each of the objections.

3. The Court held a first hearing on the Purchase Money Claims Report and objections thereto on June 24, 2011 (the "First Hearing"). The Court's minute entry regarding the First Hearing [Dock. No. 573] directed counsel for the Trustee to submit Scheduling Orders. Also, the Court's July 1, 2011 *First Order Regarding Trustee's Purchase Money Claims Report* [Dock. No. 587] (the "First Order") stated that "[c]ounsel for the Trustee and counsel for each of Joplin Regional Stockyards, Stockman Oklahoma Livestock Marketing, Inc., Piedmont Livestock, Inc., and the creditors listed in Docket No. 556, shall file proposed scheduling orders on or before July 8, 2011 for proposed proceedings to resolve the objections raised by those Objectors." (First Order ¶ 4.)

4. The Parties agree that the deadline by which to submit the proposed Scheduling Orders with respect to the contested matters involving Joplin, Piedmont and the Florida Creditors should be extended until after the omnibus hearing to be held in August in this chapter 11 case. Pursuant to the First Order, the Parties may still assert additional claims and/or objections which, in the interests of judicial economy, should be consolidated and resolved pursuant to the Scheduling Orders. As such, the Parties respectfully request that the deadline by which to file proposed Scheduling Orders on the contested matters involving Joplin, Piedmont and the Florida Creditors be extended to and including September 1, 2011.

WHEREFORE, the Parties respectfully request an extension of the deadline by which the Parties must submit Scheduling Orders to and including September 1, 2011 and all other appropriate relief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2011, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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