

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 ORDER IN
CONTESTED MATTER AND/OR COMMENCE ADVERSARY PROCEEDING
INVOLVING THE RESERVED OBJECTIONS TO TRUSTEE'S PURCHASE MONEY
CLAIMS REPORT OF BLUEGRASS STOCKYARDS OF CAMPBELLSVILLE, LLC,
BLUEGRASS STOCKYARDS OF RICHMOND, LLC, AND
PIEDMONT LIVESTOCK COMPANY, INC.**

Counsel for James A. Knauer, as Chapter 11 Trustee for Eastern Livestock Co., LLC ("Trustee"), Bluegrass Stockyards of Campbellsville, LLC, Bluegrass Stockyards of Richmond, LLC, and Piedmont Livestock Company, Inc., (collectively, the "Objectors," and with the Trustee, the "Parties") respectfully request that the Court enter an order extending the deadline by which the Parties must submit a proposed scheduling order (the "Scheduling Order") for proposed proceedings to resolve the Objectors' objections to the *Trustee's Purchase Money Claims Report, Motion To Transfer Funds And Notice Of Release Of Proceeds From Account* [Dock. No. 501] ("Purchase Money Claims Report") and/or commence a related adversary proceeding. In support of this motion ("Motion"), the Parties state as follows:

1. On May 23, 2011, the Trustee filed the Purchase Money Claims Report.
2. The Objectors filed objections to the Purchase Money Claims Report.
3. On September 1, 2011, the Court entered the *Final Order Regarding Trustee's Purchase Money Claims Report* [Dock. No. 691] (the "Final Order"). Paragraph 5 of the Final Order provided that the Trustee and Objectors "shall upload agreed scheduling orders for proceedings to resolve each of the Reserved Objections, if no related adversary proceedings have been filed". (Final Order, ¶5.)

4. The Parties agree that the deadline by which to submit the proposed Scheduling Order and/or to commence a related adversary proceeding should be extended for an additional thirty days to allow the parties additional time to come to an agreement. The Parties believe that there may be additional claims asserted or assertable by and between the Parties that, in the interests of judicial economy, should be consolidated and resolved pursuant to the Scheduling Order. As such, the Parties respectfully request that the deadline by which to file the proposed Scheduling Order and/or to commence a related adversary proceeding be extended to and including October 20, 2011.

WHEREFORE, the Parties respectfully request an extension of the deadline by which the Parties must submit the Scheduling Order and/or commence a related adversary proceeding to and including October 20, 2011 and all other appropriate relief.

Respectfully submitted,

BAKER & DANIELS, LLP

By: /s/ Dustin R. DeNeal

James M. Carr (#3128-49)
Robert K. Stanley (#1745-49)
Terry E. Hall (#22041-49)
Dustin R. DeNeal (#27535-49)
300 N. Meridian Street, Suite 2700
Indianapolis, IN 46204-1782
jim.carr@bakerd.com
robert.stanley@bakerd.com
terry.hall@bakerd.com
dustin.deneal@bakerd.com

Counsel for James A. Knauer, Chapter 11 Trustee

Wendy W. Ponader (#14633-49)
600 East 96th Street, Suite 600
Indianapolis, IN 46240
wendy.ponader@bakerd.com

DELCOTTO LAW GROUP PLLC

By: /s/ Laura Day DelCotto

Laura Day DelCotto
200 North Upper Street
Lexington, KY 40507
ldelcotto@dlgfirm.com

*Counsel for Bluegrass Stockyards of
Campbellsville, LLC, Bluegrass Stockyards of
Richmond, LLC, and Piedmont Livestock Company,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 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.

David L. Abt
davidabt@mwt.net

C. R. Bowles, Jr
crb@gdm.com

John Hunt Lovell
john@lovell-law.net

Mark A. Robinson
mrobinson@vhrlaw.com

Jeffrey R. Erler
jeffe@bellnunnally.com

Edward M King
tking@fbtlaw.com

Randall D. LaTour
rdlatour@vorys.com

John R. Carr, III
jrciii@acs-law.com

Bret S. Clement
bclement@acs-law.com

Daniel J. Donnellon
ddonnellon@ficlaw.com

Stephen A. Weigand
sweigand@ficlaw.com

John Frederick Massouh
john.massouh@sprouselaw.com

John W. Ames
jwa@gdm.com

Robert Hughes Foree
robertforee@bellsouth.net

Kim Martin Lewis
kim.lewis@dinslaw.com

Jeremy S Rogers
Jeremy.Rogers@dinslaw.com

Ivana B. Shallcross
ibs@gdm.com

Deborah Caruso
dcaruso@daleeke.com

Meredith R. Thomas
mthomas@daleeke.com

William Robert Meyer, II
rmeyer@stites.com

Allen Morris
amorris@stites.com

Charles R. Wharton
Charles.R.Wharton@usdoj.gov

James Bryan Johnston
bjtexas59@hotmail.com

James T. Young
james@rubin-levin.net

David L. LeBas
dlebas@namanhowell.com

Judy Hamilton Morse
judy.morse@crowedunlevy.com

John M. Thompson
john.thompson@crowedunlevy.com

Jessica E. Yates
jyates@swlaw.com

John Huffaker
john.huffaker@sprouselaw.com

Matthew J. Ochs
matt.ochs@moyewhite.com

Laura Day Delcotto
ldelcotto@dlgfirm.com

Kelly Greene McConnell
lisahughes@givenspursley.com

T. Kent Barber
kbarber@dlgfirm.com

Ross A. Plourde
ross.plourde@mcafeetaft.com

Walter Scott Newbern
wsnewbern@msn.com

Kirk Crutcher
kcrutcher@mcs-law.com

Todd J. Johnston
tjohnston@mcjllp.com

Timothy T. Pridmore
tpridmore@mcjllp.com

Theodore A Konstantinopoulos
ndohbky@jbandr.com

Karen L. Lobring
lobring@msn.com

Elliott D. Levin
robin@rubin-levin.net
edl@trustesolutions.com
Sean T. White
swhite@hooverhull.com

Michael W. McClain
mike@kentuckytrial.com

James Edwin McGhee
mcghee@derbycitylaw.com

Jerald I. Ancel
jancel@taftlaw.com

David Alan Domina
dad@dominalaw.com

Jill Zengler Julian
Jill.Julian@usdoj.gov

Michael Wayne Oyler
moyler@rwsvlaw.com

Sandra D. Freeburger
sfreeburger@dsf-atty.com

John M. Rogers
johnr@rubin-levin.net

Robert H. Foree
robertforee@bellsouth.net

William E Smith
wsmith@k-glaw.com

Thomas C Scherer
tscherer@binghamchale.com

Jeffrey J. Graham
jgraham@taftlaw.com

Kent A Britt
kabritt@vorys.com

Jeffrey L Hunter
jeff.hunter@usdoj.gov

Jason W. Cottrell
jwc@stuartlaw.com

Lisa Koch Bryant
courtmail@fbhlaw.net

John David Hoover
jdhoover@hooverhull.com

Sarah Stites Fanzini
sfanzini@hopperblackwell.com

Susan K. Roberts
skr@stuartlaw.com

David A. Laird
david.laird@moyewhite.com

Trevor L. Earl
tearl@rwsvlaw.com

Joshua N. Stine
jnstine@vorys.com

Amelia Martin Adams
aadams@dlgfirm.com

Robert A. Bell
rabell@vorys.com

I further certify that on September 20, 2011, a copy of the foregoing pleading was served via electronic mail transmission on the following:

Ashley S. Rusher
asr@blancolaw.com

Darla J. Gabbitas
darla.gabbitas@moyewhite.com

/s/ Dustin R. DeNeal