

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

**AGREED MOTION TO EXTEND DEADLINE TO FILE SCHEDULING ORDER  
REGARDING CONTESTED MATTER INVOLVING TRUSTEE'S PURCHASE  
MONEY CLAIMS REPORT AND OBJECTIONS FILED BY SOLM, CRUMPLER  
BROS., KUEHNY AND THE BANK OF KREMLIN**

Counsel for James A. Knauer, as Chapter 11 Trustee for Eastern Livestock Co., LLC ("Trustee") respectfully requests that the Court enter an order extending the deadline by which the Trustee must submit a proposed scheduling order (the "Proposed Scheduling Order") for proposed proceedings to resolve the *Trustee's Purchase Money Claims Report, Motion To Transfer Funds And Notice Of Release Of Proceeds From Account* (docket #501) ("Purchase Money Claims Report"), the *Response And Objection Of Stockman Oklahoma Livestock Marketing, Inc. To The Trustee's Purchase Money Claims Report, Motion To Transfer Funds And Notice Of Release Of Proceeds From Account* [Dock. No. 545] (the "SOLM Objection"), the *Response And Objection Of Crumpler Bros. To The Trustee's Purchase Money Claims Report, Motion To Transfer Funds And Notice Of Release Of Proceeds From Account* [Dock. No. 546] (the "Crumpler Objection"), and the *Response And Objection Of Brent Kuehny d/b/a Dollar K Cattle Co., And The Bank Of Kremlin To The Trustee's Purchase Money Claims Report, Motion To Transfer Funds And Notice Of Release Of Proceeds From Account* [Dock. No. 544] (the "Kuehny/Kremlin Objection" and collectively with the SOLM Objection and

Crumpler Objection, the "Objections"). In support of this motion ("Motion"), the Trustee states as follows:

1. Stockman Oklahoma Livestock Marketing, Inc. ("SOLM"), Crumpler Bros. ("Crumpler"), Brent Kuehny d/b/a Dollar K Cattle Co. ("Kuehny") and The Bank of Kremlin ("Kremlin" and collectively with SOLM, Crumpler and Kuehny, the "Objectors") filed the Objections to the Purchase Money Claims Report.

2. 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.)

3. Counsel for the Trustee and counsel for the Objectors believe that they are in agreement on the terms of the Proposed Scheduling Order. However, the parties have not yet finalized a Proposed Scheduling Order for filing with the Court. As a result, the Trustee requests that the deadline to file a Proposed Scheduling Order to resolve the Objections be extended through and including July 15, 2011.

4. Counsel for the Objectors consents to and joins in the relief requested in this Motion.

WHEREFORE, the Trustee respectfully requests an extension of the deadline to submit a Proposed Scheduling Order to resolve the Objections to and including July 15, 2011 and all other appropriate relief.

Respectfully submitted,

By: /s/ Dustin R. DeNeal

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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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I further certify that on July 8, 2011, a copy of the foregoing pleading was served via electronic mail transmission on the following:

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