

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 INVOLVING THE FLORIDA OBJECTORS' RESERVED  
OBJECTIONS TO TRUSTEE'S PURCHASE MONEY CLAIMS REPORT**

Counsel for James A. Knauer, as Chapter 11 Trustee for Eastern Livestock Co., LLC ("Trustee"), 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 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 Florida 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"). 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 Florida 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 Florida 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 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 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 to and including October 20, 2011 and all other appropriate relief.

Respectfully submitted,

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**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.

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