

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

In re:) Chapter 11
)
EASTERN LIVESTOCK CO., LLC, et al.,¹) Case No. 10-93904-BHL-11
)
Debtors.) JOINTLY ADMINISTERED

**AGREED MOTION TO EXTEND DEADLINES IN SCHEDULING ORDER
REGARDING CONTESTED MATTER INVOLVING REX ELMORE'S RESERVED
OBJECTIONS TO TRUSTEE'S PURCHASE MONEY CLAIMS REPORT**

James A. Knauer ("Trustee") and Rex Elmore ("Elmore" and collectively with the Trustee, the "Parties"), respectfully request that the Court extend certain of the deadlines set forth in the *Scheduling Order Regarding Contested Matter Involving Rex Elmore's Reserved Objections to Trustee's Purchase Money Claims Report* [Dock. No. 702] (the "Scheduling Order") as requested herein because the Parties believe that the requested extensions will reduce costs and allow the Parties to work towards an informed settlement in light of pending determinations in this chapter 11 case that will affect this contested matter.

This contested matter involves the same or similar issues as currently before the Court pursuant to separate pleadings. Because the Court's decision on those matters will affect the Parties' positions, settlement negotiations and scope of discovery, the Parties respectfully request that the Court enter an order extending certain of the deadlines contained in the Scheduling Order pending the Court's determination of similar issues in separate matters. Specifically, the Parties request that 1) the deadline by which depositions shall be completed be extended through and including February 20, 2012, 2) the deadline by which the Parties shall file with the Court a stipulation of material facts not in dispute and a notice identifying their

¹ The Debtor entities are Eastern Livestock Co., LLC and Okie Farms, L.L.C.

suggested fact and legal issues to be decided by the Court be extended through and including March 5, 2012 and 3) the dispositive motion deadline be extended through and including March 30, 2012.

WHEREFORE, the Parties respectfully request that the Court enter an order extending the deadlines contained in the Scheduling Order as requested herein and granting the Parties all other just and proper relief.

Respectfully submitted,

By: /s/ Dustin R. DeNeal

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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2012, 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 January 4, 2012, a copy of the foregoing pleading was served via electronic mail transmission on the following:

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