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Attorneys for Official Joint Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**

In re  
JAMES C. GIANULIAS,  
Debtor.

Case No. 8:08-bk-13150-RK  
Substantively Consolidated With:  
Case No. 8:08-bk-13151-RK  
Chapter 11

In re  
CAMEO HOMES, a California corporation,  
Debtor.

**STIPULATION TO CONTINUE DATE  
FOR THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO FILE  
AVOIDANCE ACTION AGAINST  
XROADS SOLUTIONS GROUP LLC.**

**[Order uploaded concurrently herewith]**

**[NO HEARING REQUIRED]**

**TO THE HONORABLE ROBERT KWAN, UNITED STATES BANKRUPTCY JUDGE,  
THE OFFICE OF THE UNITED STATES TRUSTEE, AND INTERESTED PARTIES:**

This Stipulation is entered into by and between the Official Committee of  
Unsecured Creditors appointed in the above-captioned bankruptcy cases (the  
"Committee"), Debtors James C. Gianulias and Cameo Homes, Inc. ("Debtors") and  
XRoads Solutions Group, LLC ("XRoads") with reference to the following facts:

1. On June 6, 2008, certain creditors filed involuntary petitions against Debtors  
commencing the instant bankruptcy cases. On July 1, 2008, Debtors each filed a  
Consent to the Entry of an Order for Relief and Election to Convert Chapter 7 Case to a

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Case Under Chapter 11 of the Bankruptcy Code. On July 2, 2008, the Court entered Orders for Relief and converted both cases to ones under chapter 11.

2. Pursuant to 11 U.S.C. §546, the last date to file an avoidance action is two years after the entry of the Order for Relief.

3. Pursuant to Debtors' proposed Plan of Reorganization, the responsibility for prosecuting avoidance actions will be assigned to the Creditors' Trust.

4. The Confirmation hearing is currently set for July 9, 2010 and the parties anticipate that the Confirmation Order will be entered shortly thereafter.

5. In order to allow the Committee and, thereafter, the Creditors Trust time to review payments to XRoads to determine if an avoidance action is necessary, the Committee has requested and Debtors and XRoads have agreed that the time to file such action shall be extended for 90 days, to and including September 29, 2010.

**WHEREFORE, IT IS HEREBY STIPULATED AND AGREED** that the deadline for the Committee and, thereafter, the Creditors Trust to file an avoidance action against XRoads is extended to September 29, 2010.

DATED: July 1, 2010

**SulmeyerKupetz**  
A Professional Corporation

By: 

Elissa D. Miller  
Attorneys for Official Committee of  
Unsecured Creditors

DATED: July 1, 2010

**Irell & Manella LLP**

By: \_\_\_\_\_

Alan Friedman  
Kerri Lyman  
Attorneys for Debtors James C. Gianulias  
and Cameo Homes

Signatures continue on next page

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A Professional Corporation

By:

\_\_\_\_\_  
Elissa D. Miller  
Attorneys for Official Committee of  
Unsecured Creditors

DATED: July 1, 2010

**Irell & Manella LLP**

By:

\_\_\_\_\_  
Alan Friedman  
Kerri Lyman  
Attorneys for Debtors James C. Gianulias  
and Cameo Homes

Signatures continue on next page

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1 DATED: July 1, 2010

XRoads Solutions Group, LLC

2  
3 By: 

Todd Doyle  
General Counsel

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In re:

JAMES C. GIANULIAS, and CAMEO HOMES, a California corporation

Debtors.

CHAPTER: 11

CASE NO. 8:08-bk-13150-RK (Substantively Consolidated with Case No. 8:08-bk-13151-RK)

**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
333 South Hope Street, Thirty-Fifth Floor, Los Angeles, California 90071-1406.

A true and correct copy of the foregoing document described as **STIPULATION TO CONTINUE DATE FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO FILE AVOIDANCE ACTION AGAINST XROADS SOLUTIONS GROUP LLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d), and (b) in the manner indicated below:

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** - Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On July 1, 2010, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the e-mail address indicated below:

- John B. Acierno, Esq. — JPMorgan Chase Bank, N.A. [ecfcacb@piteduncan.com](mailto:ecfcacb@piteduncan.com)
- Jess R. Bressi, Esq. — Famille Holdings L.P. [jbressi@luce.com](mailto:jbressi@luce.com)
- Jon M. Chatalian, Esq. — Pension Benefit Guaranty Corp. [efile@pbgc.gov](mailto:efile@pbgc.gov)
- Paul J. Couchot, Esq. — Debtor Cameo Homes [pcouchot@winthropcouchot.com](mailto:pcouchot@winthropcouchot.com)
- Melissa Davis, Esq. — Pacific Mercantile Bank [mdavis@shbllp.com](mailto:mdavis@shbllp.com)
- Susan S. Davis, Esq. — Laing/Sequoia Partners LLC [sdavis@coxcastle.com](mailto:sdavis@coxcastle.com)
- Daniel Denny, Esq. — Deutsche Bank Berkshire Mortgage, Inc. [ddenny@gibsondunn.com](mailto:ddenny@gibsondunn.com)
- Lei Lei Wang Ekvall, Esq. — Charlene H. Immell [lekvall@wgllp.com](mailto:lekvall@wgllp.com)
- David K. Eldan, Esq. — Pacific Western Bank [malvarado@pmcos.com](mailto:malvarado@pmcos.com)
- Alan J. Friedman, Esq. — Debtor James C. Gianulias [afriedman@irell.com](mailto:afriedman@irell.com)
- Debra Dietrich, Esq. — Croudace & Dietrick LLP [debra.dietrich@2d2law.com](mailto:debra.dietrich@2d2law.com)
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- Beth Gaschen, Esq. — Michael W. Immell [bgaschen@wgllp.com](mailto:bgaschen@wgllp.com)
- Robert P. Goe, Esq. — Lucas Companies [rgoe@goeforlaw.com](mailto:rgoe@goeforlaw.com)
- Michael J. Hauser, Esq. — Office of the U.S. Trustee (SA) [kmurphy@goeforlaw.com](mailto:kmurphy@goeforlaw.com)
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- Marsha A. Houston, Esq. — Wachovia Bank, N.A. [ustpreion16.sa.ecf@usdoj.gov](mailto:ustpreion16.sa.ecf@usdoj.gov)
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- Bradford Klein — Clarke Masonry, Inc. [john.immordino@wilsonelser.com](mailto:john.immordino@wilsonelser.com)
- Donna L. La Porte, Esq. — National Bank of Arizona [ljurich@loeb.com](mailto:ljurich@loeb.com)
- Daniel A. Lev, Esq. — Joint Creditors' Committee [brad.e.klein@gmail.com](mailto:brad.e.klein@gmail.com)
- Kerri A. Lyman, Esq. — Debtor James C Gianulias [vcorbin@wrightlegal.net](mailto:vcorbin@wrightlegal.net)
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- Mike D. Neue, Esq. — Debtor James C. Gianulias [emiller@sulmeyerlaw.com](mailto:emiller@sulmeyerlaw.com)
- Penelope Parmes, Esq. — Marilyn Robbins Gianulias [randym@cookseylaw.com](mailto:randym@cookseylaw.com)
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- Cassandra J. Richey, Esq. — Courtesy NEF [tpomeroy@klinedinstlaw.com](mailto:tpomeroy@klinedinstlaw.com)
- Christopher O. Rivas, Esq. — Wachovia Bank, N.A. [hrafatjoo@pszilaw.com](mailto:hrafatjoo@pszilaw.com)

In re:

JAMES C. GIANULIAS, and CAMEO HOMES, a California corporation

Debtors.

CHAPTER: 11

CASE NO. 8:08-bk-13150-RK (Substantively Consolidated with Case No. 8:08-bk-13151-RK)

- Martha E. Romero, Esq. — Riverside County Treasurer-Tax Coll.
- Anthony J. Rothman, Esq. — Universal Bank
- Victor A. Sahn, Esq. — Joint Creditors' Committee
- John D. Schlotter, Esq. — Wells Fargo Bank, N.A.
- Mark C. Schnitzer, Esq. — Interwest Mtg. Inv. Co.
- Leonard M. Shulman, Esq. — Pacific Mercantile Bank
- Timothy J. Silverman — Wells Fargo Bank, N.A.
- Derrick Talerico, Esq. — Housing Capital Company
- James E. Till, Esq. — Debtor Cameo Homes
- Matthew S. Walker, Esq. — Bank Of The West
- Joshua D. Wayser, Esq. — California National Bank
- Steven F. Werth, Esq. — Joint Creditors' Committee
- Deborah A. Winslow — Mercedes-Benz Credit Corporation
- John H. Wunsch, Esq. — Fasching Haus East Condo Assoc.

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☐ Service Information continued on attached page.

## II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):

On July 1, 2010, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follow. *Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.*

### Attorneys for Debtors

Kerri A. Lyman, Esq.  
 Irell & Manella LLP  
 840 Newport Center Drive, Suite 400  
 Newport Beach, CA 92660

Todd Doyle, General Counsel  
 XRoads Solutions Group, LLC  
 1821 East Dyer Road, Suite 225  
 Santa Ana, CA 92705

☐ Service Information continued on attached page.

**III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served):** Pursuant to F.R.Civ.P.5 and/or controlling LBR, on July 1, 2010, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method ) by facsimile transmission and/or email as follows. *Listing the judge here constitutes a declaration that personal delivery to the judge will be completed no later than 24 hours after the document is filed.*

The Honorable Robert Kwan  
 U.S. Bankruptcy Court  
 411 W. Fourth Street, Suite 5165  
 Santa Ana, CA 92701-4593

☐ Service Information continued on attached page.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

July 1, 2010

Date

Denise Givens

Type Name

/s/Denise Givens

Signature