UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

Chapter 11

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TAYLOR, BEAN & WHITAKER MORTGAGE CORE REO SPECIALISTS, LLC, and HOME AMERICA MORTGAGE, INC.,	P.,	Case No. 3:09-bk-07047-JAF Case No. 3:09-bk-10022-JAF Case No. 3:09-bk-10023-JAF
Debtors.	/	Jointly Administered Under Case No. 3:09-bk-07047-JAF

MOTION OF STICHTER, RIEDEL, BLAIN & PROSSER, P.A., FOR ADJUSTMENT OF TIMETABLE AND FOR SHORT ENLARGEMENT OF TIME TO FILE FOURTH INTERIM APPLICATION FOR ALLOWANCE

STICHTER, RIEDEL, BLAIN & PROSSER, P.A. ("SRBP"), as attorneys for the Debtors and Debtors in Possession in these jointly administered Chapter 11 cases, requests an adjustment of the anticipated timetable and a seven-day enlargement of the time within which to file its fourth interim application for allowance, upon the following grounds:

1. Upon motion of Debtor Taylor, Bean & Whitaker Mortgage Corp. (the "Debtor") (Doc. No. 443), and after notice and a hearing, the Court entered its *Order Establishing Procedures for Payments to Professionals of Interim Compensation for Services and Reimbursement of Expenses* dated November 9, 2009 (Doc. No. 620) (the "Interim Compensation Procedures Order"), which sets forth approved procedures for professionals to seek payment on an interim basis of compensation for services rendered and reimbursement for expenses incurred. The Interim Compensation Procedures Order

also sets forth an anticipated schedule for the filing of interim applications to approve compensation and expense reimbursement amounts.

- 2. Following the Interim Compensation Procedures Order, the professionals employed in this case, including SRBP, filed first, second, and third interim applications on a four-month recurring schedule. The Court conducted hearings on the first, second, and third series of interim applications and entered orders on those applications. Under the anticipated time schedule, fourth interim fee applications are scheduled to be filed on or before January 18, 2011.
- 3. SRBP seeks a short, seven-day enlargement of time within which to complete its fourth interim application in order to ensure the completeness and accuracy of the application and of the itemizations of professional services and expenses to be filed in support of the application.
- 4. Prior to filing this motion, SRBP has consulted with the other professionals employed in this case, who have no objection and who consent to the proposed short adjustment of the proposed timetable. SRBP proposes that the adjustment or extension be applicable to any professional, if needed.
- 5. A seven-day extension would not disrupt or delay the consideration of professionals' applications or delay the administration of these Chapter 11 cases.

WHEREFORE, SRBP respectfully requests that the Court grant this motion; adjust the timetable for the filing of fourth interim applications to January 25, 2011, and enlarge the time for filing applications accordingly; schedule interim applications of all

applications for hearing in due course; and grant such other and further relief as is just and proper.

/s/ Russell M. Blain

Russell M. Blain (FBN 0236314) Edward J. Peterson (FBN 0014612)

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ATTORNEYS FOR DEBTORS AND

DEBTORS IN POSSESSION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing *Motion Of Stichter, Riedel, Blain & Prosser, P.A., for Short Extension of Time to File Fourth Interim Application for Allowance* have been furnished by the Court's CM/ECF system and/or by U.S. Mail to the parties listed on the Local Rule 1007-2 Parties-in- Interest Matrix, on this <u>18th</u> day of January, 2011.

/s/ Russell M. Blain
Attorney

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