

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In re:) Chapter 11
)
TWG CAPITAL, INC.,) Case No. 12-11019-BHL-11
)
Debtor.)

**MOTION TO EXTEND DEADLINE FOR FILING DEBTOR'S STATEMENT AND
SCHEDULES PURSUANT TO 11 U.S.C. § 521 AND FED. R. BANKR. P. 1007(c)**

TWG Capital, Inc., the debtor and debtor-in-possession (the "Debtor") in the above captioned chapter 11 case (the "Chapter 11 Case"), hereby files this motion (the "Motion") for entry of an order extending the date by which the Debtor must file its Statement of Financial Affairs, Schedules of Assets and Liabilities, and Income and Expense Schedule (collectively, the "Statement and Schedules") pursuant to 11 U.S.C. § 521 and Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). The proposed form of the order granting the Motion is attached hereto as Exhibit A.

JURISDICTION

1. On September 14, 2012 (the "Petition Date"), the Debtor filed with the United States Bankruptcy Court for the Southern District of Indiana, Indianapolis Division (this "Court"), its voluntary petition for relief under chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. as amended (the "Bankruptcy Code") commencing the Chapter 11 Case. The Debtor continues to operate its business as debtor-in-possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.

2. No trustee or examiner has been appointed, and no committee has yet been appointed or designated.

3. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief sought herein are §§ 105(a) and 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c).

BACKGROUND AND EVENTS LEADING TO FILING

5. The Debtor is a specialty finance company that serves the insurance industry. The Debtor is headquartered at 7434 Shadeland Station Way, Indianapolis, Indiana 46256.

6. A more detailed explanation of the background and business of the Debtor and the events leading to the Chapter 11 Case are set forth in the *Declaration Of Mark P. Nondorf In Support Of Chapter 11 Petition And First Day Applications And Motions* (Docket No. 4) (the "Nondorf Declaration").

RELIEF REQUESTED

7. Pursuant to Bankruptcy Rule 1007(c), the current date by which the Debtor is obligated to file the Statement and Schedules is September 28, 2012 (the "Schedule Deadline"), which is fourteen days after the Petition Date.

8. By the Motion, the Debtor seeks entry of an order extending the Schedule Deadline for an additional fourteen (14) days, up to and including October 12, 2012.

BASIS FOR RELIEF REQUESTED

9. The Debtor is in the process of assembling the information necessary to complete the Statement and Schedules. The Debtor reasonably requires additional time to ensure that it can accurately and completely fill out the Statement and Schedules.

10. Bankruptcy Rule 1007(c) provides that the Schedule Deadline may be extended "for cause shown." Cause exists for extending the Schedule Deadline.

11. As set forth in detail in the Nondorf Declaration, the Chapter 11 Case is projected to progress on an accelerated timeline. Accordingly, the Debtor's principals have been required to devote significant time to other preliminary issues in the Chapter 11 Case. Further, the complexity of the Debtor's business operations coupled with certain reductions in the Debtor's staff have prevented the Debtor from finalizing the Statement and Schedules.

12. The short extension requested herein will allow the Debtor to file the Statement and Schedules prior to the 341 meeting of creditors.

NOTICE

13. Pursuant to Rule B-1007-1(c)(2) of the Local Rules of the United States Bankruptcy Court for the Southern District of Indiana, the United States Trustee is "deemed to have no objection to any original request for extension of time within which to file schedules or related documents if that request seeks extension to no more than forty-five (45) after the date the petition is filed." Nevertheless, the undersigned counsel for the Debtor notified the United States Trustee of the relief requested in the Motion, and the United States Trustee indicated that she had no objection to the relief requested in the Motion.

NO PRIOR REQUEST

14. No previous request for the relief requested herein has been made to this Court in the Chapter 11 Case.

WHEREFORE, the Debtor respectfully requests that the Court enter an order (a) extending the Schedule Deadline for fourteen (14) days, up to and including October 12, 2012 in which the Debtor will file the Statement and Schedules, and (b) granting such other and further relief as this Court deems appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 25, 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 September 25, 2012, a copy of the foregoing pleading was mailed by first-class U.S. Mail, postage prepaid and properly addressed, to the following:

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