

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

GREEN BOX NA GREEN BAY, LLC,

Case #16-24179

Debtor.

Chapter 11

**AMENDMENT
TO DEBTOR'S REVISED 3rd AMENDED PLAN
OF REORGANIZATION DATED DECEMBER 21, 2016
CONCERNING ARTICLE VI - RELEASE & INJUNCTION**

NOW COMES the Debtor, Green Box NA Green Bay, LLC, by its attorneys, Steinhilber Swanson LLP, by Paul G. Swanson, and hereby amends the Revised 3rd Amended Plan of Reorganization dated December 21, 2016 as follows:

BACKGROUND

The Securities and Exchange Commission (SEC) objected to confirmation of the Debtor's 3rd Amended Plan (Docket Entry. 204). The Debtor and counsel for the SEC have subsequently agreed to modify language which addresses concerns of the SEC with regard to Article VI of the Debtor's proposed Plan. Based on agreement, the Debtor is proposing this amendment, which the SEC indicates is acceptable to it and will address its objection.

AMENDMENT

Article VI: Release & Injunction shall be amended by adding the following to the end of the Article:

Paul G. Swanson
Steinhilber Swanson LLP
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Notwithstanding any provision herein to the contrary or an abstention from voting on the Plan, no provision of the Plan, or any order confirming the Plan, (i) releases any non-debtor person or entity from any Claim or cause of action of the SEC; or (ii) enjoins, limits, impairs or delays the SEC from commencing or continuing any Claims, causes of action, proceedings or investigations against any non-debtor person or entity in any forum.

Dated this 24th day of January, 2017.

STEINHILBER SWANSON LLP
Counsel for the Debtor

By:



Paul G. Swanson

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