

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

---

In re:

GREEN BOX NA GREEN BAY, LLC,  
  
Debtor.

Case No. 16-24179  
  
Chapter 11

---

**PAPER HOLDCO, LLC'S MODIFICATION OF ITS MOTION TO DISMISS IN  
REPLY TO WISCONSIN ECONOMIC DEVELOPMENT CORPORATION'S  
LIMITED OBJECTION TO THE MOTION**

---

On October 5, 2017, Paper Holdco, LLC filed a motion to dismiss this case (the "Motion"). [ECF No. 306.] On October 26, Wisconsin Economic Development Corporation filed a limited objection to the Motion and requested that this case be converted to chapter 7 rather than dismissed. [ECF No. 330.] In reply to the limited objection, Paper Holdco hereby modifies its requested relief in the Motion and requests the Court to convert this case instead of dismissing it.

Dated: November 1, 2017

**WINTHROP & WEINSTINE, P.A.**

By: *s/Christopher A. Camardello*  
Christopher A. Camardello, #1077922

225 South Sixth Street, Suite 3500  
Minneapolis, Minnesota 55402  
Telephone: (612) 604-6400  
Facsimile: (612) 604-6800  
[ccamardello@winthrop.com](mailto:ccamardello@winthrop.com)

Attorneys for Paper Holdco, LLC

14439614v1