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20 November 2017

Via CM/ECF

The Honorable Beth E. Hanan
United States Bankruptcy Court,
Eastern District of Wisconsin

Re: In re Green Box NA Green Bay, LLC
Case No. 16-24179-BEH 11

Dear Judge Hanan:

On October 3, 2017, Ability Insurance Company filed a Motion for Relief, or in the Alternative, Motion to Dismiss (Docket 301). On October 5, 2017, Paper Holdco, LLC filed a Motion to Dismiss (Docket 306). A briefing schedule was thereafter entered.

Paper Holdco today withdrew its Motion (Docket at 342). Although Ability was granted the primary relief it requested in its Motion by Order entered November 7, 2017 (Docket 340), it continued at the November 1, 2017 hearing to support dismissal, the additional relief originally requested in its motion, as opposed to conversion to Chapter 7.

Earlier today our office sought clarification regarding whether the briefing scheduled was moot or still operative. To the extent operative, a brief and affidavits supporting conversion are timely filed herewith. To the extent moot, Wisconsin Economic Development Corporation is able file its own Motion to Convert in the relative near future.

Very truly yours,

/s/
Brian P. Thill

BPT:bpt
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Judge Hanan It
cc: Counsel of record (via CM/ECF)

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