

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

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In re:

Green Box NA Green Bay, LLC,  
Debtor.

Case No. 16-24179

Chapter 11

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**MOTION TO EXTEND DEADLINE BY 24 HOURS TO FILE 1<sup>ST</sup> AMENDED  
DISCLOSURE STATEMENT**

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NOW COMES the Debtor, Green Box NA Green Bay, LLC, by its attorneys, Steinhilber Swanson LLP, and Paul G. Swanson, and hereby moves the Court for a twenty-four (24) hour extension within which the Debtor must file its 1<sup>st</sup> Amended Disclosure Statement and accompanying proposed Plan. As grounds for such Motion, the Debtor's counsel asserts as follows:

1. He has diligently been working with his client on formulating an alternative Plan which is both feasible and more, in the opinion of the Debtor, acceptable to the creditors.
2. Additional information recently was discovered relating to particular class(es) of creditors which had to be incorporated into the Disclosure Statement and Plan as of the afternoon of November 8, 2016, the deadline date for the filing.
3. While a slap-dash filing could be made, the Debtor's counsel believes it would be better to take a bit of extra time to harmonize the final product and believes that a twenty-four (24) hour extension would not prejudice any party in interest.
4. The Debtor's counsel asks that the Court extend the deadline by one day, through and November 9, 2016, for these reasons.

Drafted by:  
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Dated this 8<sup>th</sup> day of November, 2016.

STEINHILBER SWANSON, LLP  
Attorneys for the Debtor

By:   
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Paul G. Swanson