

1 Richard M. Pachulski (CA Bar No. 90073)  
Ira D. Kharasch (CA Bar No. 109084)  
2 Robert M. Saunders (CA Bar No. 226172)  
PACHULSKI STANG ZIEHL & JONES LLP  
3 10100 Santa Monica Blvd., 13th Floor  
Los Angeles, CA 90067  
4 Telephone: 310/277-6910  
Facsimile: 310/201-0760  
5 E-mail: rpachulski@pszjlaw.com  
ikharasch@pszjlaw.com  
6 rsaunders@pszjlaw.com

7 Attorneys for Eagan Avenatti, LLP,  
Debtor and Debtor in Possession

8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **SANTA ANA DIVISION**

11 In re:  
12 EAGAN AVENATTI, LLP,  
13  
14 Debtor.

Case No.: 8:17-bk-11961-CB

Chapter 11

**THIRD STIPULATION AMONG DEBTOR,  
JASON FRANK LAW, PLC/SCOTT SIMS,  
AND THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO  
CONTINUE THE HEARING ON  
DEBTOR'S MOTION TO EXTEND TIME  
PERIODS DURING WHICH DEBTOR HAS  
EXCLUSIVE RIGHT TO FILE A PLAN  
AND SOLICIT ACCEPTANCES OF IT  
PURSUANT TO SECTION 1121(d) OF THE  
BANKRUPTCY CODE**

Current Hearing:

Date: October 25, 2017

Time: 10:00 a.m.

Place: Courtroom 5D

Proposed Hearing:

Date: January 10, 2018

Time: 10:00 a.m.

Place: Courtroom 5D

Judge: Hon. Catherine E. Bauer

1           **IT IS HEREBY STIPULATED** by and between Eagan Avenatti, LLP, the debtor herein  
2 (the “Debtor”), Jason Frank Law, PLC and Scott Sims (“JFL/Sims”), and the Official Committee of  
3 Unsecured Creditors (the “Committee”, and together with the Debtor and JFL/Sims, the “Parties”),  
4 each by and through their respective counsel of record, that the hearing on *Debtor’s Motion for*  
5 *Order Extending Time Periods During Which Debtor Has Exclusive Right to File a Plan and Solicit*  
6 *Acceptances of It Pursuant to Section 1121(d) of the Bankruptcy Code* (the “Motion”) [Docket No.  
7 146], currently set for October 25, 2017 at 10:00 a.m. in Courtroom 5D in the above-entitled Court,  
8 be continued to January 10, 2018 at 10:00 a.m., or as soon thereafter as the Motion may be heard by  
9 the Court (subject to the terms below).

10           **IN SUPPORT THEREOF**, the Parties stipulate to the following:

11           A. Debtor filed its Motion on July 5, 2017.

12           B. On July 19, 2017, JFL/Sims filed an opposition to the Motion, and requested a  
13 hearing [Docket No. 165].

14           C. The Court set the Motion to be heard on August 9, 2017.

15           D. On August 9, 2017, the Court continued the hearing the Motion to September 20,  
16 2017.

17           E. On September 19, 2017, the Court further continued the on hearing on the Motion to  
18 October 4, 2017.

19           F. On October 3, 2017, the Court further continued the hearing on the Motion to  
20 October 25, 2017.

21           G. The Parties are currently involved in settlement negotiations, including a possible  
22 resolution of this matter. As a result of such negotiations, JFL/Sims agrees to the continuation of the  
23 hearing on the Motion to January 10, 2018 at 10:00 a.m, subject to the Debtor filing a plan and  
24 disclosure statement on terms acceptable to JFL/Sims, on or before November 17, 2017; provided,  
25 however, if this does not occur, the Motion would be advanced and heard on the merits on  
26 November 29, 2017 at 10:00 a.m.<sup>1</sup>

27 <sup>1</sup> The Parties have filed a *Fourth Stipulation Among Debtor, Jason Frank, Law, PLC, and the Official Committee of*  
28 *Unsecured Creditors to Continue the Hearing on Jason Frank Law, PLC’s Motion for Relief from the Automatic Stay*  
(the “Stay Relief Motion”), seeking to have the Stay Relief Motion continued from October 25, 2017 to January 10, 2018  
at 10:00 a.m. (subject to the terms of such stipulation).

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**WHEREFORE**, the Parties hereby request that the Court continue the hearing on the Motion from October 25, 2017 to January 10, 2018 at 10:00 a.m., subject to the Debtor filing a plan and disclosure statement on terms acceptable to JFL/Sims, on or before November 17, 2017; provided, however, if this does not occur, the Motion would be advanced and heard on the merits on November 29, 2017 at 10:00 a.m. The continuation of the hearing on the Motion is without prejudice to the Debtor's supplementation of the Motion (or the filing of a new motion) on or before November 7, 2017 seeking extended plan-filing and solicitation exclusivity deadlines of up to January 31, 2018 and March 30, 2018, which are after the extended deadlines of November 7, 2017 and January 4, 2018 (respectively) requested in the Motion, and each of JFL/Sims and the Committee agrees that it will not contest such request for supplemental or new requested deadlines on the basis that the deadlines requested in the Motion passed before the supplemental extended deadlines were approved by the Court.

PACHULSKI STANG ZIEHL & JONES LLP  
ATTORNEYS AT LAW  
LOS ANGELES, CALIFORNIA

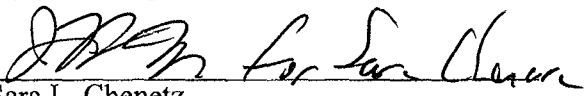
Dated: October 24, 2017

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Robert M. Saunders  
Robert M. Saunders, Attorneys for Eagan Avenatti, LLP, Debtor and Debtor in Possession

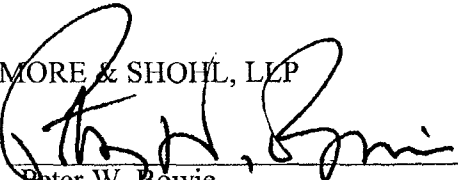
Dated: October 24, 2017

PERKINS COIE LLP

By   
Sara L. Chenetz  
Attorneys for Jason Frank Law, PLC

Dated: October 24, 2017

DINSMORE & SHOHL, LLP

By   
Peter W. Bowie,  
Attorneys for Official Committee of Unsecured Creditors

**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067**

A true and correct copy of the foregoing document entitled (*specify*): **THIRD STIPULATION AMONG DEBTOR, JASON FRANK LAW, PLC/SCOTT SIMS, AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO CONTINUE THE HEARING ON DEBTOR'S MOTION TO EXTEND TIME PERIODS DURING WHICH DEBTOR HAS EXCLUSIVE RIGHT TO FILE A PLAN AND SOLICIT ACCEPTANCES OF IT PURSUANT TO SECTION 1121(D) OF THE BANKRUPTCY CODE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **October 24, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **October 24, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA MESSENGER/PERSONAL DELIVERY**

Honorable Catherine E. Bauer  
United States Bankruptcy Court  
Central District of California  
411 West Fourth Street, Suite 5165  
Santa Ana, CA 92701-4593

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 24, 2017  
*Date*

Myra Kulick  
*Printed Name*

/s/ Myra Kulick  
*Signature*

**SERVICE LIST**

**Eagan Avenatti, LLP**  
**Chapter 11 Case No. 8:17-bk-11961-CB**

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- *Mikel R Bistrow* mikel.bistrow@dinsmore.com, caron.burke@dinsmore.com
- *Peter W Bowie* peter.bowie@dinsmore.com, caron.burke@dinsmore.com
- *Christopher Celentino* chris.celentino@dinsmore.com, caron.burke@dinsmore.com
- *Sara Chenetz* schenetz@perkinscoie.com, dlax@perkinscoie.com;cmallahi@perkinscoie.com
- *David B Golubchik* dbg@lnbyb.com, dbg@ecf.inforuptcy.com
- *Michael J Hauser* michael.hauser@usdoj.gov
- *Mark S Horoupian* mhoroupian@sulmeyerlaw.com, ppenn@sulmeyerlaw.com;mhoroupian@ecf.inforuptcy.com;dperez@sulmeyerlaw.com;ppenn@ecf.inforuptcy.com
- *Sheri Kanesaka* sheri.kanesaka@fnf.com, Christine.hipp@fnf.com
- *Isaac Marcushamer*
- *Malhar S Pagay* mpagay@pszjlaw.com, mpagay@pszjlaw.com
- *R Gibson Pagter* gibson@ppilawyers.com, ecf@ppilawyers.com;r51779@notify.bestcase.com
- *Misty A Perry Isaacson* misty@ppilawyers.com, ecf@ppilawyers.com;r51779@notify.bestcase.com
- *Thomas J Polis* tom@polis-law.com, paralegal@polis-law.com;r59042@notify.bestcase.com
- *Robert M Saunders* rsaunders@pszjlaw.com, rsaunders@pszjlaw.com
- *Najah J Shariff* najah.shariff@usdoj.gov, USACAC.criminal@usdoj.gov
- *David H Stein* dstein@wilentz.com
- *Michael K Symons* mike@symonsmarkwith.com, mike@symonsmarkwith.com
- *United States Trustee (SA)* ustpregion16.sa.ecf@usdoj.gov