1 2	JACOB L. EATON, CSB NO. 244834 KLEIN, DENATALE, GOLDNER, COOPER, ROSENLIEB & KIMBALL, LLP		
3	4550 California Avenue, Second Floor Bakersfield, CA 93309		
4	Telephone: (661) 395-1000 Facsimile: (661) 326-0418		
5	Email: jeaton@kleinlaw.com		
6	Attorneys for Debtor-in-Possession		
7			
8	UNITED STATES BANKRUPTCY COURT		
9	EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION		
10			
11	In re:	Case No.: 17-10238-B-11	
12	SILO CITY, INC. Debtor-in-Possession.	Chapter 11	
13	Deotor-III-Possessioii.	DCN: KDG-6	
14		Date: N/A Time: N/A	
15		Place: United States Bankruptcy Court 510 19 th Street, Suite 200	
16		Bakersfield, California	
17	DERTOR'S EY PARTE MOTIO		
18	DEBTOR'S EX PARTE MOTION FOR FURTHER TIME TO FILE DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION		
19	TO THE HONORABLE RENE LASTRETO II, UNITED STATES BANKRUPTCY JUDGE:		
20	SILO CITY, INC., Debtor and Debtor-in-Possession ("Debtor") represents:		
21	1. Debtor filed a Voluntary Petition under Chapter 11 of the United States		
22	Bankruptcy Code on January 25, 2017. Debtor is a corporation owned by Michael Clift.		
23	Debtor has no employees. However, Mr. Clift's parents, Larry and Patricia Clift, and sister,		
24	Marcia Clift, have assisted him in managing Debtor.		
25	2. The Court ordered that Debtor f	ile its plan and disclosure statement on or before	
26	November 6, 2017. Debtor was in the process of preparing its plan and disclosure statement		
,7	and prepared to file both documents on or before November 6, 2017. However, yesterday		

27

28

Michael Clift's father, Larry Clift, suffered a sudden fatal heart attack.

1	
2	
3]
4]
5	
6	
7	
8	
9	,
10	
11	
12	;
13	
14	1
15	
16]
17	j
18	
19]
20	(
21	
22	(
23	
24]

- 3. The Clift family needs time to make funeral arrangements and recover from the loss of the family patriarch. In addition, Larry Clift was the representative of Debtor for the majority of its business dealings and was a key person in Debtor's formulation of a plan and in negotiations both with lessees and with creditors. In addition, Larry Clift was an important advisor to Michael Clift. It is unclear how the passing of Larry Clift will affect Debtor's intentions with respect to the plan.
- 4. Debtor respectfully requests that the Court grant an additional thirty days from November 6, 2017, to and including December 6, 2017, for it to complete and file its plan and disclosure statement in light of the passing of Larry Clift.
- 5. The attorneys for creditors Allstar Growth Fund, LLC ("Allstar") and Investment Grade Loans, Inc. ("IGL") have informed Debtor's attorney that they do not oppose a one-month extension of Debtor's time to file a plan and disclosure statement. Allstar and IGL hold first and second deeds of trust, respectively, against Debtor's real property and are the two largest creditors in Debtor's case. Additionally, Greg Powell from the Office of the United States Trustee informed Debtor's attorney that he does not object to a 30-day extension of the plan bar date, but that the United States Trustee reserves all rights under the Code and Rules, including the right to seek relief under Section 1112.
- 6. Debtor does not believe that anyone will be substantially prejudiced if the Motion is granted because Debtor will notify its secured creditors, twenty largest unsecured creditors, and parties requesting special notice if the Motion is granted.

WHEREFORE, Debtor prays that the time for filing its plan and disclosure statement be extended for thirty (30) days to December 6, 2017, and for such other relief as may be just.

Date: November 2, 2017

25 26

27

28

KLEIN, DENATALE, GOLDNER, COOPER, ROSENLIEB & KIMBALL, LLP

By /s/Nacol

Attorneys for Debtor-in-Possession