

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**  
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In re:

HOG SNAPPERS HOLDINGS, LLC  
EIN#81-4435143,  
\_\_\_\_\_  
Debtor. /

Case No. 18-13646-MAM  
Chapter 11

**SECOND MOTION TO EXTEND EXCLUSIVITY PERIOD**

**COMES NOW, DEBTOR, HOG SNAPPERS HOLDINGS, LLC.,** by and through its undersigned Counsel, and files this Second Motion to Extend Exclusivity Period within which to file its Plan and Disclosure Statement pursuant to 11 U.S.C. §1121(e) of the United States Bankruptcy Code (the “Code”), and as grounds therefore state as follows:

1. The Debtor filed for Chapter 11 relief on March 28, 2018. The Debtor is authorized to operate and continues to operate as Debtor in Possession pursuant to 11 U.S.C. §1107(a) of the Code.
2. The exclusivity right to file a plan of reorganization and seek acceptances thereof, pursuant to 11 U.S.C. § 1121(c)(2) & (3) was previously extended up to and including October 26, 2018 and December 26, 2018 respectively, without prejudice [ECF#108].
3. 11 U.S.C. § 1121(d)(1) provides that the deadline to file a plan may be extended by the court for cause after notice and a hearing.
4. The Debtor is currently in negotiation with creditors and equity holders and is attempting to resolve objections to claims.
5. The Debtor has otherwise complied with all Chapter 11 reporting requirements and no other creditor or interested party would be prejudiced by the delay.
6. The Debtor requests an extension of time for the exclusive right to file a plan of reorganization and seek acceptances thereof, pursuant to 11 U.S.C. § 1121(c)(2) & (3) up to and

including December 26, 2018 and February 26, 2019.

**WHEREFORE**, Debtor respectfully requests an Order from this Court granting an extension of time for the exclusive right to file a plan of reorganization and seek acceptances thereof, pursuant to 11 U.S.C. § 1121(c)(2) & (3) up to and including December 26, 2018 and February 26, 2019, and such other relief as the court deems fair and equitable.

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to all parties on the attached Service List in the manner stated therein, this 25<sup>th</sup> day of October, 2018.

I hereby certify that I am admitted to the Bar of the United States District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this Court set forth in Local rule 2090-1(A).

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### **SERVICE LIST**

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All creditors and interested parties on this Court's List of Creditor as attached hereto.

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