

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	Case No. 17-24513 GLT
Bradley Distributing, Inc.,	)	
	)	Chapter 11
Debtor	)	Docket No.
	)	
	)	
Bradley Distributing, Inc.,	)	
	)	
Movant	)	
	)	
vs.	)	
	)	
No Respondents	)	

**SECOND MOTION FOR EXTENSION OF TIME TO FILE CHAPTER 11 PLAN  
AND DISCLOSURE STATEMENT AND TO EXTEND  
DEBTOR'S EXCLUSIVITY PERIOD**

AND NOW, come the Debtor, Bradley Distributing, Inc., by and through  
Counsel, Christopher M. Frye, and respectfully represent as follows:

1. This case was commenced on November 8, 2017 when the Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code.
2. The deadline for the Debtor to file a Chapter 11 Plan and Disclosure expires on June 6, 2018 after having requested and been granted one prior extension.
3. The Debtor continues to operate as a Debtor in possession and continues to meet the operating requirements of a Chapter 11 Debtor.
4. The Debtor has filed monthly financial reports for each month of the Chapter 11 proceeding up through April 2018.

5. The Debtor has paid all US Trustee fees as they have come due since the filing of the Chapter 11 case.
6. After preparing a proposed Plan and reviewing it with the Debtor, counsel for the Debtor made a proposal with respect to plan treatment to the secured creditor with first lien priority on the assets of the Debtor in this matter, Colonial Funding Network, Inc. (“Colonial”).
7. Colonial made a counter-proposal and the two parties have been engaged in discussion for consensual plan treatment.
8. The Debtor believes that having consensual plan treatment with Colonial will allow for a much smoother confirmation process and believes that with some additional time a consensus can most likely be reached.
9. For the aforementioned reasons, counsel needs some additional time to prepare and file the Chapter 11 Plan and Disclosure Statement.
10. No creditors or parties in interest will be prejudiced by extending the time to file a Chapter 11 Plan and Disclosure Statement by approximately 30 days until July 5, 2018.
11. The Debtor is a “Small Business” as defined in 11 U.S.C. Section 101(51D) and (51C).
12. As a Small Business, the Debtor’s exclusivity period to file a Chapter 11 Plan and Disclosure Statement was set to expire on May 7, 2018 and was extended by Order of this Court to June 9, 2018.
13. Based on the foregoing, no creditors or parties in interest will be prejudiced by extending the Debtor’s exclusivity period to file a Chapter

11 Plan and Disclosure Statement by approximately 30 days until July 9, 2018.

WHEREFORE, the Debtor, Bradley Distributing, Inc., respectfully requests this Honorable Court to enter an Order extending the time to file a Chapter 11 Plan and Disclosure Statement and to extend the exclusivity period to file a Chapter 11 Plan and Disclosure Statement in this case until July 9, 2018.

Respectfully submitted,

June 5, 2018  
DATE

/s/ Christopher M. Frye  
Christopher M. Frye, Esquire  
Counsel for the Debtor

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