

1 Gregory C. Nuti (CSBN 151754)
 E-Mail: gnuti@schnader.com
 2 Kevin W. Coleman (CSBN 168538)
 E-Mail: kcoleman@schnader.com
 3 Michael M. Carlson (CSBN 88048)
 E-Mail: mcarlson@schnader.com
 4 SCHNADER HARRISON SEGAL & LEWIS LLP
 5 One Montgomery Street, Suite 2200
 San Francisco, California 94104-5501
 6 Telephone: 415-364-6700
 7 Facsimile: 415-364-6785

8 Attorneys for
 Chapter 11 Trustee, Bradley D. Sharp

9 *Counsel continued on next page*

10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA
 12 SACRAMENTO DIVISION

SCHNADER HARRISON SEGAL & LEWIS LLP
 ONE MONTGOMERY STREET, SUITE 2200
 SAN FRANCISCO, CALIFORNIA 94104-5501
 TELEPHONE: 415-364-6700
 FACSIMILE: 415-364-6785

14	IN RE:)	CIV NO. S-10-810 LKK
)	
15	SK FOODS, L.P.)	
)	STIPULATION EXTENDING DEADLINE
16	Debtor.)	TO FILE PROPOSED ORDER
)	RESOLVING APPEALS AND RELATED
17	BRADLEY D. SHARP, et al.,)	MOTIONS AND ORDER THEREON
)	
18	Plaintiff,)	
)	
19	vs.)	
)	
20	SCOTT SALYER, et al.,)	
)	
21	Defendants.)	
)	
22)	
23)	

24 *Caption continued on Page 3*

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STIPULATION EXTENDING DEADLINE

SCHNADER HARRISON SEGAL & LEWIS LLP
ONE MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CALIFORNIA 94104-5501
TELEPHONE: 415-364-6700
FACSIMILE: 415-364-6785

1 ANDREA M. MILLER (CSBN 88992)
2 NAGELEY MEREDITH & MILLER, INC.
3 8001 Folsom Boulevard, Suite 100
4 Sacramento, CA 95826
5 Telephone: 916-386-8292
6 Facsimile: 916-386-8952

7 Counsel for SK PM Corp., SK Foods, LLC,
8 SKF Canning, LLC, Blackstone Ranch
9 Corporation, Monterey Peninsula Farms, LLC,
10 Salyer Management Company, LLC, SK
11 Farms Services, LLC, SK Frozen Foods, LLC,
12 SS Farms, LLC, SSC Farming, LLC, SSC
13 Farms I, LLC, SSC Farms II, LLC, SSC
14 Farms III, LLC, SKF Aviation, LLC, and
15 CSSS, LP d/b/a Central Valley Shippers

16 PAUL J. PASCUZZI
17 FELDERSTEIN FITZGERALD
18 WILLOUGHBY & PASCUZZI LLP
19 400 Capitol Mall, Suite 1450
20 Sacramento, CA 95814
21 Telephone: 916-329-7400
22 Facsimile: 916-329-7435

23 Counsel for Scott Salyer, individually and as
24 trustee of the Scott Salyer Revocable Trust,
25 and the Scott Salyer Revocable Trust
26
27
28

SCHNADER HARRISON SEGAL & LEWIS LLP
ONE MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CALIFORNIA 94104-5501
TELEPHONE: 415-364-6700
FACSIMILE: 415-364-6785

1 BRADLEY D. SHARP, et al.) **CIV. NO. S-10-811 LKK**

2)
3 Plaintiff,)

4 vs.)

5 SKF AVIATION, LLC, et al.,)

6 Defendants.)

7 _____) **CIV. NO. S-10-812 LKK**

8 BRADLEY D. SHARP, et al.,)

9 Plaintiff,)

10 vs.)

11 SSC FARMS 1, LLC, et al.,)

12 Defendants.)

13 _____)

14 *Caption continued on next page*)

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SCHNADER HARRISON SEGAL & LEWIS LLP
ONE MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CALIFORNIA 94104-5501
TELEPHONE: 415-364-6700
FACSIMILE: 415-364-6785

1 BRADLEY D. SHARP, et al.,) **CIV NO. S-10-1492 LKK**

2)
3 Plaintiff,)

4 vs.)

5 SSC FARMS 1, LLC, et al.,)

6 Defendants.)

7 IN RE:) **CIV. NO. S-10-1493 LKK**

8 SK FOODS, L.P.)

9 Debtor.)

10 BRADLEY D. SHARP, et al.,) **CIV. NO. S-10-1496 LKK**

11 Plaintiff,)

12 vs.)

13 CSSS, L.P., et al.,)

14 Defendants.)

15)
16)
17 BRADLEY D. SHARP, et al.,) **CIV. NO. S-10-1497 LKK**

18 Plaintiff,)

19 vs.)

20 FRED SALYER IRREVOCABLE TRUST, et)
21 al.,)

22 Defendants.)

23)

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SCHNADER HARRISON SEGAL & LEWIS LLP
ONE MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CALIFORNIA 94104-5501
TELEPHONE: 415-364-6700
FACSIMILE: 415-364-6785

1 BRADLEY D. SHARP, et al.,) **CIV. NO. S-10-1498 LKK**
2)
3 Plaintiff,)
4)
5 vs.)
6)
7 SKF AVIATION, LLC, et al.,)
8)
9 Defendants.)
10)
11)
12)
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14)
15)
16)

10 BRADLEY D. SHARP, et al.,) **CIV. NO. S-10-1499 LKK**
11)
12 Plaintiff,)
13)
14 vs.)
15)
16 SCOTT SALYER, et al.,)
17)
18 Defendants.)
19)
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19 BRADLEY D. SHARP, et al.,) **CIV. NO. S-10-1500 LKK**
20)
21 Plaintiff,)
22)
23 vs.)
24)
25 SCOTT SALYER, et al.,)
26)
27 Defendants.)
28)
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SCHNADER HARRISON SEGAL & LEWIS LLP
ONE MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CALIFORNIA 94104-5501
TELEPHONE: 415-364-6700
FACSIMILE: 415-364-6785

1 Fredrick Scott Salyer, individually and as Trustee of the Scott Salyer Revocable Trust;
2 the Scott Salyer Revocable Trust; SK PM Corp.; SK Foods, LLC; SKF Canning, LLC;
3 Blackstone Ranch Corporation; Monterey Peninsula Farms, LLC; Salyer Management Company,
4 LLC; SK Farms Services, LLC; SK Frozen Foods, LLC; SS Farms, LLC; SSC Farming, LLC;
5 SSC Farms I, LLC; SSC Farms II, LLC; SSC Farms III, LLC; SKF Aviation, LLC; and CSSS,
6 LP d/b/a Central Valley Shippers (collectively, "Appellants") and Bradley D. Sharp, as Chapter
7 11 Trustee of SK Foods, L.P. ("Appellee"), by and through their respective counsel, hereby
8 stipulate and agree as follows:

9 1. On October 12, 2010, the Court heard two sets of appeals (the "Appeals") of
10 orders from the United States Bankruptcy Court for Eastern District of California. The first set
11 of appeals (2:10-cv-810; 2:10-cv-811; 2:10-cv-812) concerned three orders granting a
12 preliminary injunction in adversary proceedings arising out of the bankruptcy case, *In re SK*
13 *Foods, L.P.*, Case No. 09-29162 (the "Bankruptcy Case"). The second set of appeals (2:10-cv-
14 1492; 2:10-cv-1493; 2:10-cv-1496; 2:10-cv-1497; 2:10-cv-1498; 2:10-cv-1499; 2:10-cv-1500)
15 concerned seven orders denying motions to stay certain adversary proceedings arising out of the
16 Bankruptcy Case (the "Stay Appeals"). Concurrently therewith, the Court also heard various
17 motions related to the Stay Appeals (the "Motions").

18 2. At the hearing, the Court instructed Appellants and Appellee each to file, by
19 October 26, 2010, a proposed order (together, the "Proposed Orders") resolving certain issues
20 raised in the Appeals and the Motions. The Court's specific instructions are detailed in an order
21 entered on October 13, 2010.

22 3. Appellants and Appellee hereby agree to extend the deadline for filing of the
23 Proposed Orders by three (3) days, to October 29, 2010.

24 4. Appellants and Appellee believe that extending the deadline to October 29, 2010,
25 will enhance the parties' ability to agree to a consensual order, although the parties are unable to
26 guarantee at this time that they will be successful.

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SCHNADER HARRISON SEGAL & LEWIS LLP
ONE MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CALIFORNIA 94104-5501
TELEPHONE: 415-364-6700
FACSIMILE: 415-364-6785

1 Dated this 26th day of October, 2010.

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3 SCHNADER HARRISON SEGAL &
LEWIS LLP

FELDERSTEIN FITZGERALD
WILLOUGHBY & PASCUZZI LLP

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/s/ Gregory C. Nuti

/s/ Paul J. Pascuzzi

5

GREGORY C. NUTI

PAUL J. PASCUZZI

6

Counsel for Bradley D. Sharp, as Chapter 11
Trustee of SK Foods, L.P.

Counsel for Scott Salyer, individually and as
trustee of the Scott Salyer Revocable Trust, and
the Scott Salyer Revocable Trust

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9 SEGAL & KIRBY LLP

NAGELEY MEREDITH & MILLER, INC.

10

11

/s/ Malcolm S. Segal

/s/ Andrea M. Miller

12

MALCOLM S. SEGAL

ANDREA M. MILLER

13

Counsel for Scott Salyer, individually and as
trustee of the Scott Salyer Revocable Trust,
and the Scott Salyer Revocable Trust

Counsel for SK PM Corp., SK Foods, LLC, SKF
Canning, LLC, Blackstone Ranch Corporation,
Monterey Peninsula Farms, LLC, Salyer
Management Company, LLC, SK Farms
Services, LLC, SK Frozen Foods, LLC, SS
Farms, LLC, SSC Farming, LLC, SSC Farms I,
LLC, SSC Farms II, LLC, SSC Farms III, LLC,
SKF Aviation, LLC, and CSSS, LP d/b/a Central
Valley Shippers

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The Court, having reviewed the foregoing stipulation of the parties, hereby changes the
20 date for submission of proposed orders in this matter to October 29, 2010.

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IT IS SO ORDERED.

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October 26, 2010

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LAWRENCE K. KARLTON

SENIOR JUDGE

UNITED STATES DISTRICT COURT

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