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

21 *Please see continuation page for a complete list of the*  
 22 *moving parties and their respective counsel.*

23  
 24 UNITED STATES DISTRICT COURT  
 25 EASTERN DISTRICT OF CALIFORNIA

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In re:  
SK FOODS, LP, a California limited  
partnership, et al.,  
Debtors.

BANKRUPTCY CASE NO.: 09-29162-D-11  
Chapter 11  
U.S. District Court Case Nos.  
**2:10-cv-01492-LKK; 2:10-cv-01493-LKK**  
**2:10-cv-01496-LKK; 2:10-cv-01497-LKK**  
**2:10-cv-01498-LKK; 2:10-cv-01499-LKK**  
**2:10-cv-01500-LKK**

**STIPULATION AND ORDER EXTENDING  
DEADLINE TO FILE OPPOSITION TO AND  
POSTPONING HEARING FOR MOTION  
FOR REHEARING ON DECEMBER 10, 2010  
ORDER AND JUDGMENT REVERSING  
BANKRUPTCY COURT'S ORDER DENYING  
A STAY**

BRADLEY SHARP, et al.,  
Plaintiff,  
v.  
SSC FARMS I, LLC, et al.,  
Defendants.

**AP No. 09-02692**  
DCN: MSS-1

BRADLEY SHARP, et al.,  
Plaintiff,  
v.  
SCOTT SALYER, as trustee of the  
Scott Salyer Revocable Trust, et al.,  
Defendants.

**AP No. 10-02014**  
DCN: MSS-1

BRADLEY SHARP, et al.,  
Plaintiff,  
v.  
SCOTT SALYER, in his individual  
capacity and as trustee of the Scott  
Salyer Revocable Trust, et al.,  
Defendants.

**AP No. 10-02015**  
DCN: MSS-1

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BRADLEY SHARP, et al.,  
Plaintiff,  
v.  
SKF AVIATION, LLC, et al.,  
Defendants.

**AP No. 10-02016**  
DCN: MSS-1

BRADLEY SHARP, et al.,  
Plaintiff,  
v.  
FRED SALYER IRREVOCABLE  
TRUST, et al.,  
Defendants.

**AP No. 10-02017**  
DCN: MSS-1

BRADLEY SHARP, et al.,  
Plaintiff,  
v.  
CSSS, L.P., et al.,  
Defendants.

**AP No. 09-02543**  
DCN: MSS-1

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**CONTINUATION SHEET: PARTIES**  
**AND THEIR RESPECTIVE COUNSEL**

<p>STEVEN H. FELDERSTEIN, State Bar No. 056978 PAUL J. PASCUZZI, State Bar No. 148810 TANIA M. MOYRON, State Bar No. 235736 FELDERSTEIN FITZGERALD WILLOUGHBY &amp; PASCUZZI LLP 400 Capitol Mall, Suite 1450 Sacramento, California 95814 Telephone: (916) 329-7400 Facsimile: (916) 329-7435 sfelderstein@ffwplaw.com ppascuzzi@ffwplaw.com tmoyron@ffwplaw.com</p> <p>Counsel for Scott Salyer, individually and as trustee of the Scott Salyer Revocable Trust, and the Scott Salyer Revocable Trust</p>	<p>ANDREA M. MILLER, State Bar No. 88992 NAGELEY MEREDITH &amp; MILLER, INC. 8001 Folsom Boulevard, Suite 100 Sacramento, California 95826 Telephone: (916) 386-8292 Facsimile: (916) 386-8952 amiller@nmlaw.com</p> <p>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</p>
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<p>GREGORY C. NUTI, State Bar No. 151754 KEVIN W. COLEMAN, State Bar No. 168538 SCHNADER HARRISON SEGAL &amp; LEWIS LLP One Montgomery Street, Suite 2200 San Francisco, California 94104-5501 Telephone: 415-364-6700 Facsimile: 415-364-6785 gnuti@schnader.com kcoleman@schnader.com</p> <p>Counsel for Bradley D. Sharp, Chapter 11 Trustee</p>	

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

10 1. On December 27, 2010, Appellee filed the Motion for Rehearing on December 10,  
11 2010 Order and Judgment Reversing Bankruptcy Court's Order Denying a Stay (the "Motion for  
12 Rehearing") in the above-captioned appeals. The Motion for Rehearing was set for hearing on  
13 January 31, 2011 at 10:00 a.m. and the deadline to file an opposition to the Motion for Rehearing  
14 was January 17, 2011.

15 2. On December 30, 2010, Appellants filed an opposition to the Motion for  
16 Rehearing, asking the Court to delay the hearing until sometime at the end of March 2011  
17 because of the illness of one of Appellants' attorneys and reserving the right of Appellants to file  
18 a supplemental opposition to the Motion for Rehearing.

19 3. On January 14, 2011, the Court entered an order (the "Extension Order")  
20 extending the deadline for Appellants to file an opposition to the Motion for Rehearing until  
21 January 19, 2011 at 9:00 a.m.

22 4. On or around January 14, 2011, Appellants and Appellee agreed to participate in  
23 mediation concerning, among other things, the Motion for Rehearing with Judge Michael  
24 McManus in the next sixty (60) days (the "Mediation"). Because the Motion for Rehearing will  
25 be negotiated as part of the Mediation, Appellants and Appellee also agreed to postpone the  
26 hearing on the Motion for Rehearing to no earlier than March 31, 2011 and, as a result, extend the  
27 deadline to file an opposition to the Motion for Rehearing to no earlier than March 17, 2011.

28 5. The parties further agree that the ultimate date of the deadline for Appellants to

1 file their opposition should be determined under the Local Rules of the United States District  
2 Court for the Eastern District of California (the "Local Rules") based on the date of the hearing  
3 set by the Court.

4 6. Appellants and Appellee believe that delaying the hearing on the Motion for  
5 Rehearing and extending the deadline to file an opposition to the Motion for Rehearing will  
6 enhance the parties' ability in the Mediation to agree to a consensual resolution of the issues  
7 raised in the Motion for Rehearing, although the parties are unable to guarantee at this time that  
8 they will be successful.

9 7. On January 21, 2011, the Court entered an order (the "Order") requesting that  
10 counsel for the Appellants file a notice indicating why they did not file a timely supplemental  
11 opposition to the Motion for Rehearing pursuant to the Extension Order.

12 8. In response to the Order, Appellants hereby apologize to the Court for the delay in  
13 filing this Stipulation. Between January 14, 2011 and January 24, 2011, Appellants and Appellee  
14 were in the process of negotiating the details of an interim settlement agreement to delay the  
15 numerous open issues between Appellants and Appellee, including the Motion for Rehearing,  
16 while the parties participate in the Mediation. As a result of such efforts, Appellants and  
17 Appellee are hereby filing this Stipulation.

18 9. As a result of the forgoing, Appellants and Appellee hereby jointly request that the  
19 Court enter an order continuing the hearing on the Motion for Rehearing to a date no earlier than  
20 March 31, 2011, with the deadline for Appellants to file their opposition to the Motion for  
21 Rehearing to be determined under the Local Rules, based on the date of the hearing set by the  
22 Court.

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1 Dated this 25th day of January, 2011

2 SCHNADER HARRISON SEGAL &  
3 LEWIS LLP

4 /S/ MICHAEL M. CARLSON  
MICHAEL M. CARLSON  
5 Counsel for Bradley D. Sharp, as Chapter 11  
Trustee of SK Foods, L.P.

6

7 SEGAL & KIRBY LLP

8

9 /S/ MALCOLM S. SEGAL  
MALCOLM S. SEGAL  
10 Counsel for Scott Salyer, individually and as  
trustee of the Scott Salyer Revocable Trust,  
11 and the Scott Salyer Revocable Trust

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16 LAW OFFICE OF LARRY  
LICHTENNEGER

17

18 /S/ LARRY LICHTENNEGER  
LARRY LICHTENNEGER  
19 Counsel for the Fred Salyer Irrevocable  
Trust, Gerard Rose as trustee of the Fred  
20 Salyer Irrevocable Trust, and Scott Salyer,  
individually and as trustee of the Scott  
21 Salyer Revocable Trust

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/S/ PAUL J. PASCUZZI  
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Counsel for Scott Salyer, individually and as  
trustee of the Scott Salyer Revocable Trust, and  
the Scott Salyer Revocable Trust

NAGELEY MEREDITH & MILLER, INC.


/S/ JAMES C. KEOWEN  
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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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GOOD CAUSE APPEARING, IT IS ORDERED AS FOLLOWS:

1. The hearing on the Motion for Rehearing is continued to April 11, 2011 at 10:00 a.m.
2. The deadline for Appellants to file their opposition to the Motion for Rehearing shall be determined under the Local Rules.

Dated: January 26, 2011

  
LAWRENCE K. KARLTON  
SENIOR JUDGE  
UNITED STATES DISTRICT COURT