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20 SS Farms, LLC, SSC Farming, LLC, SSC Farms I, LLC,
SSC Farms II, LLC, SSC Farms III, LLC, SKF Aviation,
21 LLC, and CSSS, LP d/b/a Central Valley Shippers

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

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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF CALIFORNIA

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4 In re:
5 SK FOODS, LP, a California limited
6 partnership, et al.,
7 Debtors.

BANKRUPTCY CASE NO.: 09-29162-D-11

Chapter 11

**U.S. District Court Case Nos.
2:10-cv-2912-LKK; 2:10-cv-2913-LKK
2:10-cv-2914-LKK**

**STIPULATION AND ORDER MODIFYING
BRIEFING SCHEDULE IN BANKRUPTCY
APPEAL OF ORDER MODIFYING
PRELIMINARY INJUNCTION**

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11 BRADLEY D. SHARP,
12 Plaintiff,
13 vs.
14 SSC FARMS I, LLC, et al.,
15 Defendants.

AP No. 09-02692
DCN: FWP-1

Chapter 11

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17 BRADLEY SHARP,
18 Plaintiff,
19 vs.
20 SCOTT SALYER, et al.,
21 Defendants.

AP No. 10-02014
DCN: FWP-1

Chapter 11

22 BRADLEY SHARP,
23 Plaintiff,
24 vs.
25 SFK AVIATION, LLC et al.,
26 Defendants.

AP No. 10-02016
DCN: FWP-1

Chapter 11

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

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1 Scott Salyer, as trustee of the Scott Salyer Revocable Trust; the Scott Salyer Revocable
2 Trust; SK PM Corp.; SK Foods, LLC; SKF Canning, LLC; Blackstone Ranch Corporation;
3 Monterey Peninsula Farms, LLC; Salyer Management Company, LLC; SK Farms Services, LLC;
4 SK Frozen Foods, LLC; SS Farms, LLC; SSC Farming, LLC; SSC Farms I, LLC; SSC Farms II,
5 LLC; SSC Farms III, LLC; SKF Aviation, LLC; and CSSS, LP d/b/a Central Valley Shippers
6 (collectively, “Appellants”), on the one hand, and Bradley D. Sharp (“Appellee”), the duly
7 appointed and acting chapter 11 trustee of substantively consolidated debtors SK Foods, L.P., a
8 California limited partnership, and RHM Industrial/Specialty Foods, Inc., a California
9 corporation, d/b/a Colusa County Canning Co., on the other hand, by and through their respective
10 counsel, hereby stipulate and agree as follows:

11 1. On January 11, 2011, the Court entered a briefing schedule (the “Briefing
12 Schedule”) for the appeals filed in the above-captioned cases (collectively, the “Appeals”).
13 Pursuant to the Briefing Schedule, Appellants were to submit their opening brief and excerpts of
14 record on January 25, 2011.

15 2. On or around January 14, 2011, Appellants and Appellee agreed to participate in
16 mediation concerning, among other things, the Appeals with Judge Michael McManus in the next
17 sixty (60) days (the “Mediation”). Appellants and Appellee also agreed to postpone the briefing
18 of the Appeals as the issues in the Appeals will be negotiated as part of the Mediation.

19 3. Appellants and Appellee hereby agree that the deadline for Appellants to file their
20 opening brief and excerpts of record should be extended to March 17, 2011, and that all other
21 briefing thereafter regarding the Appeals should be conducted pursuant to a briefing schedule in
22 accordance with the rules of this Court and the Federal Rules of Bankruptcy Procedure (the
23 “Bankruptcy Rules”).

24 4. Appellants and Appellee believe that postponing the briefing of the Appeals will
25 enhance the parties’ ability in the Mediation to agree to a consensual resolution of the issues in
26 the Appeals, although the parties are unable to guarantee at this time that they will be successful.

27 5. For the foregoing reasons, Appellants and Appellee hereby jointly request that the
28 Court enter an order setting March 17, 2011 as the deadline for Appellants to file their opening

1 brief and excerpts of record in the Appeals, and that all other briefing thereafter regarding the
2 Appeals should be conducted pursuant to a briefing schedule in accordance with the rules of this
3 Court and the Bankruptcy Rules.

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6 Dated this 27th day of January, 2011
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9 SCHNADER HARRISON SEGAL &
10 LEWIS LLP

11 /S/ MICHAEL A.

12 CARLSON

13 MICHAEL M. CARLSON

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

16 SEGAL & KIRBY LLP

17 /S/ MALCOLM S.

18 SEGAL

19 MALCOLM S. SEGAL

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21 Scott Salyer Revocable Trust and the Scott
22 Salyer Revocable Trust

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23 /S/ PAUL J. PASCUZZI

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/S/ JAMES C. KEOWEN

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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. March 17, 2011 shall be the deadline for Appellants to file their opening brief and excerpts of record in the Appeals, and
2. The deadlines of all other briefing regarding the Appeals shall be determined under the rules of this Court and the Bankruptcy Rules.

Dated: January 27, 2011.


LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT