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 Plaintiff-Appellee
 6 Mohamed Poonja

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IN THE UNITED STATES COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

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In re:
 14 SAN JOSE AIRPORT HOTEL, LLC, dba
 HOLIDAY INN SAN JOSE,
 15 MOBEDSHAHI HOTEL GROUP,

Case No. CV 17-cv-0858 EJD

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(U.S. Bankruptcy Court, N. Dist. Calif.
 (San Jose) Case No. 09-51045-SLJ;
 Jointly Administered with 09-51073-SLJ;
 Adv. Pro. No. 11-05236)

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18 MOHAMED POONJA,
 Plaintiff-Appellee

UNOPPOSED MOTION
 FOR EXTENSION OF TIME
 TO FILE APPELLEE’S REPLY
 BRIEF; AND
~~PROPOSED~~ ORDER

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Plaintiff-Appellee Mohamed Poonja, by and through his counsel of record, hereby moves the Court for a 12 day extension of time, from August 18, 2017, to and including August 30, 2017, to file the appellee’s reply brief in this matter.

1 In support of this motion, James A. Hennefer declares as follows:

2 1. I am counsel for Mohamed Poonja in this appeal. I was trial counsel in the underlying
3 adversary proceeding before the United States Bankruptcy Court and I am the sole counsel for Mr. Poonja
4 on appeal.

5 2. This appeal involves three prior proceedings and the records from those proceedings. It
6 involves primarily an adversary proceeding *Poonja v. Sevak & Sons, LLP, et al.*, United States
7 Bankruptcy Court for the Northern District of California (San Jose Division) Adv. No. 11-05236. There
8 are also two prior bankruptcy proceedings giving rise to the adversary proceeding, that were chapter 11
9 proceedings converted to chapter 7 proceedings: a) *In re San Jose Airport Hotel, LLC*, United States
10 Bankruptcy Court for the Northern District of California (San Jose Division), Case No. 09-51045-SLJ; and
11 b) *In re Mobedshahi Hotel Group*, United States Bankruptcy Court for the Northern District of California
12 (San Jose Division), Case No. 09-51073-SLJ. There are over four hundred docket entries in these
13 proceedings. Appellant designated 56 of these docket entries in its designation of the record (Doc. No.
14 4-1) consisting of hundreds of pages of materials. (Docs. Nos. 4-2 through 4-26)

15 3. Appellant's opening brief was originally due on April 3, 2017. With the consent of
16 Appellee, Appellant moved for a 30-day extension of time to file his brief, to and including May 3, 2017.
17 (Doc. No. 8) The Court granted Appellant's motion. (Doc. No. 9) Appellant filed his opening brief on
18 May 3, 2017.

19 4. Appellee filed his opening brief on July 3, 2017 (Doc. No. 14) after being granted one
20 unopposed extension of 30 days.

21 5. Appellant sought and received two unopposed extensions to file his reply brief. This reply
22 brief was filed on August 4, 2017. (Doc. No. 19)

23 6. Appellee's reply brief would be due on August 18, 2017. Appellee has not sought nor
24 received any extensions of time for this brief. Due to the extensions granted to Appellant, the schedule
25 for Appellee's reply brief came into conflict with a several medical tests and examinations that had to be
26 scheduled months ago, within a 30 day window in advance of major surgery set for September 12, 2017.
27 These could not be rescheduled without postponing the surgery and they require my seeking additional
28 time for the reply brief.

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IN THE UNITED STATES COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re:
SAN JOSE AIRPORT HOTEL, LLC, dba
HOLIDAY INN SAN JOSE,
MOBEDSHAHI HOTEL GROUP,

Case No. CV 17-cv-0858 EJD
(U.S. Bankruptcy Court, N. Dist. Calif.
(San Jose) Case No. 09-51045-SLJ
Jointly Administered with 09-51073-SLJ;
Adv. Pro. No. 11-05236)

MOHAMED POONJA,
Plaintiff-Appellee

~~PROPOSED~~ ORDER EXTENDING TIME
TO FILE APPELLEE'S OPENING BRIEF

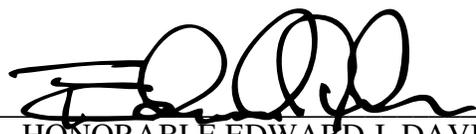
vs.

CHANDRAKANT SHAH
Defendant-Appellant

Appellee having moved the Court and good cause appearing therefor,

IT IS HEREBY ORDERED that the Plaintiff-Appellee Mohamed Poonja be permitted to file his opening
brief in this appeal on or before August 30, 2017

Dated: August 16, 2017



HONORABLE EDWARD J. DAVILA
United States District Court Judge

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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2017, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. A certificate of service for mailing as to all participants in the case who are not registered CM/ECF users will be filed with the Clerk of the Court

/s/ James A. Hennefer