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8 *Attorneys for Yvette Weinstein, Chapter 7 Trustee*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 In re:
12 LIONEL, SAWYER & COLLINS, LTD.,
13 Debtor.

Case No. 2:17-cv-00036-GMN-NJK

14 YVETTE WEINSTEIN, CHAPTER 7
15 TRUSTEE,
16 Plaintiff,

Bankruptcy Case No. BK-S-15-10462-MKN

Chapter 7

Adversary Proceeding No. 16-01123-MKN

17 vs.
18 AMERICAN LEGION CHINA POST 1 –
19 THE GENERALS WARD & CHENNAULT
20 & LT. HELSETH POST, a Texas nonprofit
21 corporation; and H. OWNBY, temporary
22 trustee of The Fischer Trust,
23 Defendants.

24 **MOTION TO EXTEND DEADLINE FOR RESPONSE TO**
25 **MOTION FOR WITHDRAWAL OF REFERENCE**

26 Plaintiff YVETTE WEINSTEIN ("Chapter 7 Trustee" or "Plaintiff"), in her capacity as
27 Chapter 7 Trustee of the bankruptcy estate of Lionel Sawyer & Collins, Ltd. ("LSC" or the
28 "Debtor"), by and through her counsel, Schwartzer & McPherson Law Firm, respectfully moves
this Court for an extension of the deadline for the Trustee to file a response to the pending *Motion*
for Withdrawal of Reference (the "Motion") filed by defendant American Legion China Post 1 -

1 The Generals Ward & Chennault & Lt. Helseth Post and defendant H. Ownby (collectively the
2 “Defendants”).

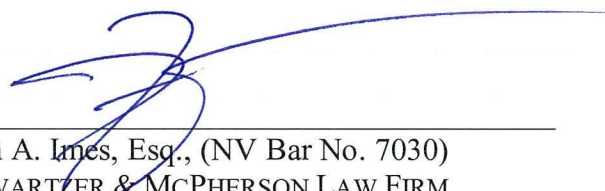
3 1. Neither the Chapter 7 Trustee (Yvette Weinstein) nor her counsel received notice of
4 the U.S. District Court case assignment. It appears notice was instead served by mail to the Office
5 of the United States Trustee, a third-party neither named nor participating in this action.

6 2. Chapter 7 Trustee’s counsel was therefore unaware that the case had been assigned,
7 and that the response deadline to the Motion was January 18, 2017.

8 3. This situation was brought to the attention of Chapter 7 Trustee’s counsel last night
9 by Defendants’ counsel, and Defendants’ counsel has graciously agreed to extend the deadline for
10 the Chapter 7 Trustee to respond to the Motion for ten (10) days until Monday February 6, 2017.

11 4. Accordingly, the Chapter 7 Trustee requests that the deadline for her to respond to
12 the Motion be extended to Monday, February 6, 2017, and that the subsequent reply deadlines
13 applicable to Defendants be correspondingly extended.

14 Dated: January 27, 2017.

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16 _____
17 Jason A. Ines, Esq., (NV Bar No. 7030)
18 SCHWARTZER & MCPHERSON LAW FIRM
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20 Las Vegas, NV 89146
21 *Attorneys for Yvette Weinstein, Chapter 7 Trustee*

22 **ORDER**

23 **IT IS HEREBY ORDERED** that the deadline to respond to the Motion for Withdrawal, (ECF
24 No. 1), is **EXTENDED** to February 6, 2017.

25 
26 _____
27 UNITED STATES DISTRICT COURT JUDGE

28 DATED this 6 day of February, 2017.