

Peggy Hunt (No. 6060)
Milo Steven Marsden (No. 4879)
Nathan S. Seim (No. 12654)
DORSEY & WHITNEY LLP
136 South Main Street, Suite 1000
Salt Lake City, UT 84101
Telephone: (801) 933-7360
Email: hunt.peggy@dorsey.com
marsden.steve@dorsey.com
seim.nathan@dorsey.com
*Attorneys for D. Ray Strong, Estate
Representative and Liquidating Trustee*

Neil A. Kaplan (No. 3974)
Jennifer A. James (No. 3914)
CLYDE SNOW & SESSIONS
201 South Main Street, Suite 1300
Salt Lake City, Utah 84111
Telephone: (801) 322-2516
Email: nak@clydesnow.com
jaj@clydesnow.com
Attorneys for Kirby Cochran

Loren E. Weiss (No. 3969)
Jennifer R. Korb (No. 9147)
RAY QUINNEY & NEBEKER
36 South State Street, Suite 1400
P.O. Box 45385
Salt Lake City, Utah 84145
Telephone: (801) 532-1500
Email: lweiss@rqn.com
jkorb@rqn.com
Attorneys for Douglas Child

Schuyler G. Carroll (*Admitted Pro Hac Vice*)
PERKINS COIE LLP
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: scarroll@perkinscoie.com
*Attorneys for Jeff Austin, Keith Green and
William Grundy*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

DOUGLAS CHILD, KIRBY COCHRAN,
JEFFREY AUSTIN, WILLIAM GRUNDY
AND KEITH GREEN,

Petitioners,

v.

D. RAY STRONG, as Liquidating Trustee of
the Consolidated Legacy Debtors Liquidating
Trust, the Castle Arch Opportunity Partners I,
LLC Liquidating Trust and the Castle Arch
Opportunity Partners II, LLC Liquidating
Trust,

Respondent.

Case No. 2:14-cv-00626-BSJ

The Honorable Bruce S. Jenkins

(Pending Withdrawal of Contested Matter from
the United States Bankruptcy Court for the
District of Utah)

Bankruptcy Case No. 11-35082
The Honorable Joel T. Marker

**STIPULATED MOTION TO RESCHEDULE HEARING DATE ON PETITIONERS'
MOTION TO WITHDRAW THE REFERENCE**

Petitioners Kirby Cochran, Douglas Child, Jeff Austin, Keith Green and William Grundy (collectively, the "Petitioners"), and Respondent D. Ray Strong, in his capacity as Liquidating Trustee of the Consolidated Legacy Debtors Liquidating Trust, the Castle Arch Opportunity Partners I, LLC Liquidating Trust and the Castle Arch Opportunity Partners II, LLC Liquidating Trust (the "Respondent") (collectively with the Respondent and the Petitioners, the "Parties"), by and through their counsel of record, stipulate and jointly move the Court for entry of the Order, attached hereto as Exhibit A, rescheduling the hearing date on the Petitioners' *Motion to Withdraw the Reference* [Docket No. 2] until October 21, 2014 at 1:30 p.m. In support hereof, the Parties state as follows:

1. On September 5, 2014, the Court entered its *Notice of Hearing* [Docket No. 5], scheduling a hearing on the Petitioners' Motion to Withdraw the Reference for September 26, 2014 at 1:30 p.m. However, Respondent's counsel is unavailable at that time.
2. The Parties understand that the Court has availability on October 21, 2014 at 1:30 p.m., and therefore request that the Court hold the hearing on Petitioners' Motion to Withdraw the Reference at that time.

WHEREFORE, the Parties respectfully request that the Court enter the Order attached hereto as Exhibit A, thereby moving the hearing on the Petitioners' Motion to Withdraw the Reference to October 21, 2014 at 1:30 p.m.

EXHIBIT A

Prepared and Submitted By:

Peggy Hunt (No. 6060)

Milo Steven Marsden (No. 4879)

Nathan S. Seim (No. 12654)

DORSEY & WHITNEY LLP

136 South Main Street, Suite 1000

Salt Lake City, UT 84101

Telephone: (801) 933-7360

Email: hunt.peggy@dorsey.com

marsden.steve@dorsey.com

seim.nathan@dorsey.com

*Attorneys for D. Ray Strong, Estate Representative
and Liquidating Trustee*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

DOUGLAS CHILD, KIRBY COCHRAN,
JEFFREY AUSTIN, WILLIAM GRUNDY
AND KEITH GREEN,

Petitioners,

v.

D. RAY STRONG, as Liquidating Trustee of
the Consolidated Legacy Debtors Liquidating
Trust, the Castle Arch Opportunity Partners I,
LLC Liquidating Trust and the Castle Arch
Opportunity Partners II, LLC Liquidating
Trust,

Respondent.

Case No. 2:14-cv-00626-BSJ

The Honorable Bruce S. Jenkins

(Pending Withdrawal of Contested Matter from
the United States Bankruptcy Court for the
District of Utah)

Bankruptcy Case No. 11-35082
The Honorable Joel T. Marker

**ORDER GRANTING STIPULATED MOTION TO RESCHEDULE HEARING ON
PETITIONERS' MOTION TO WITHDRAW THE REFERENCE**

The Court, having considered the *Stipulated Motion to Move Hearing on Petitioners' Motion to Withdraw the Reference* [Docket No. 2], and finding good cause appearing,

HEREBY ORDERS THAT:

- (1) The Motion is **GRANTED**; and
- (2) The hearing on the Petitioners' Motion to Withdraw the Reference is re-scheduled to October 21, 2014 at 1:30 p.m.

DATED this ___ day of September, 2014.

BY THE COURT

Bruce S. Jenkins
District Court Judge

Approved as to form and content:

CLYDE SNOW & SESSIONS

/s/ Jennifer A. James
Neil A. Kaplan
Jennifer A. James
Attorneys for Kirby Cochran

RAY QUINNEY & NEBEKER

/s/ Jennifer R. Korb
Loren E. Weiss
Jennifer R. Korb
Attorneys for Douglas Child

PERKINS COIE

/s/ Schuyler G. Carroll
Schuyler G. Carroll
*Attorneys for Jeff Austin, Keith Green and
William Grundy*