

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**In Re:** § **Chapter 11**  
§  
**CFO MANAGEMENT HOLDINGS,** §  
***et al.*,<sup>1</sup>** § **Case No. 19-40426**  
§  
**Debtors.** § **Jointly Administered**

**THIRD AGREED MOTION TO CONTINUE HEARING ON [DOC 158] MOTION TO RECONSIDER [DOC 144] ORDER GRANTING IN PART THE APPLICATION OF DEBTORS FOR AN ORDER AUTHORIZING THE EMPLOYMENT OF WINSTEAD PC AS COUNSEL FOR DEBTORS, EFFECTIVE AS OF THE PETITION DATE**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

COMES NOW movant Phillip Michael Carter (“Carter”) and respondent Winstead P.C. (“Winstead”) who file this their Third Agreed Motion to Continue Hearing on [DOC 158] Motion to Reconsider [DOC 144] Order Granting in Part the Application of Debtors for an Order Authorizing the Employment of Winstead, P.C. as Counsel for Debtors, Effective as of the Petition Date, and would respectfully show this Court as follows:

1. Hearing on this motion is set for August 13, 2019 at 2:30 p.m. Counsel for David Wallace, Chapter 11 Trustee (“Trustee”) has spoken with both counsel for Carter

---

<sup>1</sup> Carter Family Office, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX1652 Case No. 19-40432; CFO Management Holdings, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX6987, Case No. 19-40426; Christian Custom Homes, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX4648, Case No. 19-40431; Double Droptine Ranch, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX7134, Case No. 19-40429; Frisco Wade Crossing Development Partners, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX4000, Case No. 19-40427; Kingswood Development Partners, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX 1929, Case No. 19-40434; McKinney Executive Suites at Crescent Parc Development Partners, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX XXX2042, Case No. 19-40428; North-Forty Development LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX5532, Case No. 19-40430; and West Main Station Development, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX7210, Case No, 19-40433, collectively (the “Debtors”).

and Winstead and has requested that the present hearing be continued for a period of at least two months to allow the Trustee and Winstead additional time to attempt to reach a global resolution of the issues surrounding Winstead's administrative expenses. Both counsel for Carter and Winstead have agreed to the Trustee's request.

WHEREFORE PREMISIS CONSIDERED, Phillip Michael Carter and Winstead P.C. request this Court grant all relief sought herein, and such other relief as it may be entitled.

**DATED** this 9th day of August, 2019.

Respectfully submitted,

/s/ Ernest Leonard

Ernest W. Leonard, Esq.  
State Bar No. 12208750  
FRIEDMAN & FEIGER, L.L.P.  
5301 Spring Valley Road, Suite 200  
Dallas, Texas 75254  
(972) 788-1400 (Telephone)  
(972) 788-2667 (Telecopier)

**ATTORNEYS FOR PHILLIP MICHAEL  
CARTER**

and

/s/ Joseph J. Wielebinski

Joseph J. Wielebinski  
State Bar No. 21432400  
Jason A. Enright  
State Bar No. 24087475  
WINSTEAD PC  
500 Winstead Building  
2728 N. Harwood Street  
Dallas, Texas 75201  
(214) 745-5400 (Phone)  
(214) 745-5390 (Facsimile)  
jwielebinski@winstead.com  
jenright@winstead.com

**FORMER COUNSEL FOR THE  
DEBTORS AND DEBTORS-IN-POSSESSION**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Texas, Sherman Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

*/s/ Ernest W. Leonard* \_\_\_\_\_

Ernest W. Leonard

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>In Re:</b>	<b>§ Chapter 11</b>
<b>CFO MANAGEMENT HOLDINGS, et al.,<sup>1</sup></b>	<b>§ § § Case No. 19-40426</b>
<b>Debtors.</b>	<b>§ § Jointly Administered</b>

**ORDER GRANTING THIRD AGREED MOTION TO CONTINUE HEARING ON [DOC 158] MOTION TO RECONSIDER [DOC 144] ORDER GRANTING IN PART THE APPLICATION OF DEBTORS FOR AN ORDER AUTHORIZING THE EMPLOYMENT OF WINSTEAD PC AS COUNSEL FOR DEBTORS, EFFECTIVE AS OF THE PETITION DATE**

On this date, the Court considered the movants' Third Agreed Motion to Continue Hearing on [DOC 158] Motion to Reconsider [DOC 144] Order Granting in Part the Application of Debtors for an Order Authorizing the Employment of Winstead PC as Counsel for Debtors, Effective as of The Petition Date, which requests that the Court remove this cause from the currently scheduled hearing docket of August 13, 2019, at 2:30 p.m. After considering the Third Agreed Motion, the Court finds that the hearing should be reset.

---

<sup>1</sup> Carter Family Office, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX1652 Case No. 19-40432; CFO Management Holdings, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX6987, Case No. 19-40426; Christian Custom Homes, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX4648, Case No. 19-40431; Double Droptine Ranch, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX7134, Case No. 19-40429; Frisco Wade Crossing Development Partners, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX4000, Case No. 19-40427; Kingswood Development Partners, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX 1929, Case No. 19-40434; McKinney Executive Suites at Crescent Parc Development Partners, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX XXX2042, Case No. 19-40428; North-Forty Development LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX5532, Case No. 19-40430; and West Main Station Development, LLC, 3201 Dallas Parkway, Suite 200 #24, Frisco, Texas 75034, EIN# XX-XXX7210, Case No, 19-40433, collectively (the "Debtors").

IT IS THEREFORE ORDERED that the hearing shall be reset to the \_\_\_\_ day of  
\_\_\_\_\_, 2019 at \_\_\_\_\_ a.m./p.m.