

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

<p>In Re:  Vanity Shop of Grand Forks, Inc.,  Debtor.</p>	<p>Case No.: 17-30112  Chapter 11</p>
---	---

**NOTICE OF MOTION TO EXTEND CLAIM OBJECTION DEADLINE**

NOTICE IS HEREBY GIVEN that the Liquidating Debtor and the Plan Administrator have filed a Motion to Extend Claim Objection Deadline (the "Motion"). A copy of the Motion is attached and served upon you. Pursuant to the Third Plan of Liquidation dated July 18, 2018 [Doc. 799, Section 14.9], this Motion will be provided to the U.S. Trustee, the Plan Administrator, counsel to the Plan Administrator and all persons on the Liquidating Debtor's Bankruptcy Rule 2002 service list.

NOTICE IS FURTHER GIVEN that written objections to said motion, if any shall be filed with the Clerk of the US Bankruptcy Court, Quentin N. Burdick Courthouse, 655 1<sup>st</sup> Avenue North, Suite 201, Fargo, North Dakota 58102-4932 within FOURTEEN (14) days from the date of mailing of this notice. Any objections not filed and served may be deemed waived.



Dated: March 22, 2019.

**VOGEL LAW FIRM**

BY: /s/ Caren W. Stanley

Caren W. Stanley (#06100)  
cstanley@vogellaw.com  
218 NP Avenue  
PO Box 1389  
Fargo, ND 58107-1389  
Telephone: 701.237.6983  
*COUNSEL TO PLAN ADMINISTRATOR*

Dated: March 22, 2019.

**GRAY PLANT MOOTY**

BY: /s/ Phillip Bohl

Phillip Bohl (MN# 139191)  
[Phillip.bohl@gpmlaw.com](mailto:Phillip.bohl@gpmlaw.com)  
500 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: 612.632.3019  
*COUNSEL TO PLAN ADMINISTRATOR*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

In Re:  Vanity Shop of Grand Forks, Inc.,  Debtor.	Case No.: 17-30112  Chapter 11
--	--------------------------------------

**MOTION TO EXTEND CLAIM OBJECTION DEADLINE**

The Liquidating Debtor and the Plan Administrator respectfully request the Bankruptcy Court extend the Claim Objection Deadline through July 31, 2019. Section 10.12 to the Third Plan of Liquidation dated July 18, 2018 [Doc. 799] provides as follows:

**10.12 Objection to Claims.** Subsequent to the Effective Date, the Plan Administrator will have the right to object to the allowance of any claim. Such objections, if any, will be filed with the Bankruptcy Court no later than the first Business Day that is 180 calendar days after the Effective Date (the “**Claim Objection Deadline**”). The Claim Objection Deadline may be extended one or more times by the Bankruptcy Court....

The Claim Objection Deadline is currently **March 25, 2019** as identified in the Notice of Confirmation and Effective Date of Debtor’s Third Plan of Liquidation dated July 18, 2018 [Doc. 938].

The Liquidating Debtor has recently filed numerous adversary proceedings seeking to recover preferential transfers. The Plan Administrator believes it would be prudent to extend the Claim Objection Deadline in the event any additional claims are determined to be a Disputed Claim through the discovery process in the various adversary proceedings that were commenced. Accordingly, the Liquidating Debtor and the Plan Administrator respectfully request the Bankruptcy Court extend the Claim Objection Deadline through **July 31, 2019**.

Dated: March 22, 2019.

**VOGEL LAW FIRM**

BY: /s/ Caren W. Stanley

Caren W. Stanley (#06100)  
cstanley@vogellaw.com  
218 NP Avenue  
PO Box 1389  
Fargo, ND 58107-1389  
Telephone: 701.237.6983  
*COUNSEL TO PLAN ADMINISTRATOR*

Dated: March 22, 2019.

**GRAY PLANT MOOTY**

BY: /s/ Phillip Bohl

Phillip Bohl (MN# 139191)  
[Phillip.bohl@gpmlaw.com](mailto:Phillip.bohl@gpmlaw.com)  
500 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: 612.632.3019  
*COUNSEL TO PLAN ADMINISTRATOR*

3593194.1