

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

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

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.

Dated: July 8, 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



173011219070800000000001

**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 December 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 (initially set to expire on March 25, 2019) is currently July 31, 2019 pursuant to the Court’s order granting the Plan Administrator’s motion to extend claim objection deadline [Doc. 1152].

The Liquidating Debtor has 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 the Liquidating Debtor may have setoff rights with respect to a preference target’s Class 4 Claim. Accordingly, the Liquidating Debtor and the Plan Administrator respectfully request the Bankruptcy Court extend the Claim Objection Deadline through **December 31, 2019**.

Dated: July 8, 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

**Re: Vanity Shop of Grand Forks, Inc.
Case No. 17-30112**

STATE OF NORTH DAKOTA)
) SS **CERTIFICATE OF SERVICE**
COUNTY OF CASS)

Katherine Johnson, being first duly sworn, does depose and say: she is of legal age and not a party to or interested in the above-entitled matter.

On July 8, 2019, affiant caused the following document(s):

Notice and Motion to Extend Claim Objection Deadline

to be served electronically to the following:

All ECF Participants

/s/ Katherine Johnson
Katherine Johnson

Subscribed and sworn to before me this 8th day of July, 2019.

(SEAL) /s/ Sonie J. Thompson
Notary Public, Cass County, North Dakota