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11 Attorneys for Defendant Syngenta Seeds LLC

12  
13 IN THE UNITED STATES BANKRUPTCY COURT  
14 FOR THE DISTRICT OF OREGON

15 In re  
16 North Pacific Cannery & Packers, Inc.,  
Hermiston Foods, LLC, and NPCP Quincy, LLC,  
17 Debtors.

Case No. 19-62584-pcm11  
**LEAD CASE**  
  
(Jointly Administered with Case Nos.  
19-33102-pcm11 and 19-33013-pcm11)

19 North Pacific Cannery & Packers, Inc.,  
20 Hermiston Foods, LLC, and NPCP Quincy, LLC,  
21 Plaintiffs,  
22 v.  
23 Syngenta Seeds LLC,  
24 Defendant.

Adv. No. 20-06035-pcm  
**AGREED MOTION FOR EXTENSION OF  
TIME TO FILE RESPONSIVE PLEADING**

25  
26 Defendant Syngenta Seeds, LLC ("Syngenta"), with the agreement of the plaintiffs North



1 Pacific Cannery & Packers, Inc., Hermiston Foods, LLC and NPCP Quincy, LLC (the “Plaintiffs”),  
2 moves the Court for an order extending the time for Syngenta to file a responsive pleading in this  
3 adversary proceeding, and respectfully states as follows:

4           1.     On June 18, 2020, the Plaintiffs filed this adversary proceeding against Syngenta.  
5 Syngenta, through its undersigned counsel, accepted service on June 25, 2020.

6           2.     According to the summons, a responsive pleading is due to be filed on or before July  
7 19, 2020.

8           3.     To facilitate the potential for further settlement discussions before a responsive  
9 pleading is due, and to afford Syngenta sufficient time to respond, Syngenta requests and the  
10 Plaintiffs consent to an extension of time through and including July 24, 2020, for Syngenta to file a  
11 responsive pleading.  
12

13           WHEREFORE, Syngenta respectfully requests that the Court enter an order extending  
14 through and including July 24, 2020, the time Syngenta has to file a responsive pleading in this  
15 adversary proceeding. A proposed order is attached hereto as Exhibit 1.  
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17           DATED this 16th day of July, 2020.  
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1 SHUMAKER, LOOP & KENDRICK, LLP

2 By /s/ David H. Conaway

3 David H. Conaway, Esq.  
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14 *Attorneys for Syngenta Seeds, LLC*

**EXHIBIT 1**

**PROPOSED ORDER**

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re  
North Pacific Cannery & Packers, Inc.,  
Hermiston Foods, LLC, and NPCP Quincy, LLC,  
Debtors.

Case No. 19-62584-pcm11  
**LEAD CASE**  
  
(Jointly Administered with Case Nos.  
19-33102-pcm11 and 19-33013-pcm11)

North Pacific Cannery & Packers, Inc.,  
Hermiston Foods, LLC, and NPCP Quincy, LLC,  
Plaintiffs,  
v.  
Syngenta Seeds LLC,  
Defendant.

Adv. No. 20-06035-pcm  
**ORDER GRANTING AGREED MOTION  
FOR EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING**

This matter came before the Court on the *Agreed Motion for Extension of Time to File Responsive Pleading* (ECF \_\_\_\_\_, the “Motion”) filed by Syngenta Seeds LLC (“Syngenta”). Based

1 upon the Motion, the agreement of Plaintiffs to the requested relief, and good cause appearing  
2 therefor,

3 IT IS HEREBY ORDERED that the Motion is granted. The time for Syngenta to file a  
4 responsive pleading in this adversary proceeding is extended through July 24, 2020.  
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6 ###

7 Presented by:

8 SHUMAKER, LOOP & KENDRICK, LLP  
9

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on July 16, 2020, the foregoing *Agreed Motion for Extension of Time to*

3 *File Responsive Pleading* was served on:

4 Michael Fletcher, michael.fletcher@tonkon.com;  
5 Albert N. Kennedy, al.kennedy@tonkon.com;  
6 Danny Newman, danny.newman@tonkon.com; and  
7 Ava L. Schoen, ava.schoen@tonkon.com

8 through the Court's CM/ECF system.

9 */s/ David H. Conaway*  
10 \_\_\_\_\_  
11 David H. Conaway